

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

1 SUPREME COURT OF THE STATE OF NEW YORK

ORIGINAL

2 COUNTY OF SUFFOLK

3 - - -

4 RACHEL VOLKEL : INDEX NO. 619658/2019

5 Plaintiff :

6 - vs - :

7 SMITHTOWN GOSPEL :  
8 TABERNACLE and CAMP :  
9 CHERITH IN THE ADIRONDACKS :  
INC. d/b/a CAMP CEDARBROOK :  
IN THE ADIRONDACKS, INC. :

10 Defendants :

11 - - -

12 Wednesday, August 3, 2022

13 - - -

14 Sworn oral deposition of PASTOR GARY  
15 ZARLENGO, taken remotely via Zoom conference  
16 pursuant to notice, commenced at 10:11 a.m. on  
17 the above date, before Kimberly Wendt, License  
18 No. 30XT00005100, a Certified Court Reporter and  
19 Notary Public.

20 - - -

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23 d/b/a Camp Cedarbrook in the  
24 Adirondacks, Inc.

## 18 A L S O P R E S E N T:

19 Alex Held - Video Technician  
20  
21  
22  
23  
24

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1 PASTOR GARY ZARLENGO, after having  
2 been duly sworn, was examined and  
3 testified as follows:  
4

5 BY MS. NAPPI:

6 Q. Good morning, Pastor Zarlengo. My  
7 name is Hillary Nappi, and I'm with the law firm  
8 of Hach, Rose, Schiripa and Cheverie, and I  
9 represent the plaintiff Rachel Volkel in this  
10 lawsuit. Just before we get started, I want to  
11 go over a couple of rules with you, and the first  
12 one is, you understand today that you're going to  
13 be testifying under oath, correct?

14 A. Yes.

15 Q. And do you understand that that's  
16 the same oath you would take if you were sitting  
17 in a court room right now?

18 A. Yes.

19 Q. And this one is super hard for  
20 Zoom, so I'm going to try my best, and I'm going  
21 to ask that you try your best, let's try not to  
22 speak over one another. It's very hard for the  
23 court reporter to get down everything that I'm  
24 saying, and everything that you're saying, so I

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1 will do my best to let you finish an answer  
2 before I ask you the next question, and I'm going  
3 to ask you to let me finish my question, even if  
4 you know what the question will be, before you  
5 begin your answer. If at any time at all you  
6 need a break, please just let us know, we'll take  
7 however long of a break that you need. I'm just  
8 going to ask that you answer the question that is  
9 pending before we take that break. Okay?

10 The other thing is, I'm going to  
11 need you to just make sure that your answers are  
12 audible, so no shaking of the head, or, you know,  
13 hand gestures, yes, no, or whatever else you'd  
14 like to say in response to a question, because  
15 our lovely court reporter is taking down a  
16 transcript, and she can't note those things in  
17 the transcript accurately. Okay?

18 A. Yes.

19 Q. Thank you.

20 MR. LESSER: I have a question,  
21 Hillary. How would you like Pastor  
22 Zarlengo to refer to you if he --  
23 Ms. Nappi, Hillary Nappi?

24 MS. NAPPI: Hillary is fine. I

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1 don't care.

2 MR. LESSER: Okay. Hillary is

3 okay?

4 MS. NAPPI: Absolutely.

5 BY MS. NAPPI:

6 Q. Okay. So for the record, could  
7 you, please, state your full legal name?

8 A. Gary Anthony Joseph Zarlengo.

9 Q. And, Pastor Zarlengo, what county  
10 do you reside in?

11 A. Suffolk County.

12 Q. And are you currently under the  
13 influence of any drugs or alcohol that could  
14 impact your ability to testify today?

15 A. No, I am not.

16 Q. And have you ever used any other  
17 name?

18 A. No.

19 Q. Do you have any nicknames?

20 A. Yes.

21 Q. What are those nicknames?

22 A. Zar, Z-A-R.

23 Q. I like that. That's cool.

24 A. College nickname.

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1 Q. What is your highest level of  
2 education?

3 A. I received a master's degree in  
4 theological and historical studies from Oral  
5 Roberts University, Graduate School of Theology.

6 Q. And what year was that?

7 A. That would've been from '80 to  
8 '82, 1980 to 1982.

9 Q. Okay.

10 MR. ARGENTO: And what was the  
11 name of your school, Pastor?

12 THE WITNESS: Oral Roberts  
13 University, School of Theology.

14 BY MS. NAPPI:

15 Q. Have you ever been arrested?

16 A. No.

17 Q. And so I'm going to assume the  
18 answer is no, but I'm going to ask anyway, have  
19 you ever been convicted of a crime?

20 A. No, I have not.

21 Q. Thank you. And I just want to  
22 talk a little bit about how you prepared for  
23 today's deposition, and so for any of these  
24 questions I don't want you to tell me anything

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1 that you said to your counsel, or anything that  
2 your counsel said to you. Okay?

3 A. Yes.

4 Q. Thank you. Where are you located  
5 right now for this deposition?

6 A. In my former office, because I  
7 recently retired.

8 Q. And where is that office located?

9 A. In our church building, Smithtown  
10 Gospel Tabernacle on Higbie Drive in Smithtown.

11 Q. Okay. And other than Mr. Lesser,  
12 is anyone else present in the room with you  
13 today?

14 A. No one.

15 Q. And what device are you using to  
16 participate in today's deposition?

17 A. The one that's provided by  
18 Mr. Lesser.

19 Q. Okay. And are there any other  
20 windows open on your screen right now, or just  
21 the Zoom window?

22 A. Just the Zoom window that I see.

23 Q. Okay. And do you have any  
24 documents in front of you right now, sir?

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1           A.       I have your name written,  
2   Ms. Nappi.

3           Q.       Okay. And did you meet with  
4   counsel to prepare for today's deposition?

5           A.       I did.

6           Q.       And when was that meeting?

7           A.       We had a meeting before I headed  
8   out to Chicago for my mother's funeral, and then  
9   today for just a few minutes.

10          Q.       I'm sorry to hear about your mom.

11          A.       Well, thank you. She reached 96  
12   years old.

13          Q.       God bless. A lot of people don't  
14   get to that age. When you met with your counsel,  
15   other than your counsel, was anyone else present  
16   in that meeting?

17          A.       In the meeting with my counselor?

18          Q.       Yes.

19          A.       Yes. My executive pastor, Pastor  
20   Derek Prezzano.

21          Q.       And is Pastor Prezzano still  
22   associated with Smithtown Tabernacle, or is he  
23   retired?

24          A.       He is still the executive pastor.

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1 Q. Okay. How did you prepare for  
2 today's deposition?

3 A. Well, I decided to review some of  
4 the interviews that were done by the Grace  
5 organization. I just wanted to refresh my  
6 memory, and so I read through several of them,  
7 including my own, as well as my wife that was  
8 interviewed.

9 Q. Okay. And your wife is Diane  
10 Zarlengo, correct?

11 A. Yes, that's correct.

12 Q. And other than your interview and  
13 Diane's interview, what other interviews did you  
14 refresh your recollection with?

15 A. I read through Tommy and Naomi's,  
16 I read through Cliff Schrage's, I read through  
17 Pastor Forseth's, the senior pastor at the time  
18 when Ron Braaten was the youth pastor. I --  
19 yeah, that's -- those are the ones that I read  
20 through, to the best of my recall.

21 Q. And Tommy and Naomi Pierro, is  
22 that who you're referring to?

23 A. Yes.

24 Q. And when did you first receive the

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1 Grace interview transcripts?

2 A. When did I receive them? Boy, it  
3 was months ago, my best recall. All of the  
4 interviews that were done, once the subpoena was  
5 accepted and we received them, it was months ago.

6 Q. So did you receive those interview  
7 transcripts from your counsel?

8 A. Yes.

9 Q. Okay. And prior to receiving the  
10 interview transcripts from your counsel, had you  
11 ever seen those transcripts before?

12 A. No, not one of them.

13 Q. Okay. And so let's talk about  
14 that a little bit. After you read Tommy Pierro's  
15 interview transcript, did you learn anything from  
16 that transcript that you had not known before?

17 A. No.

18 Q. And after you read -- and I'm  
19 sorry, I'm going to mispronounce his last name, I  
20 think it's Cliff Schrage's transcript?

21 A. Yes, Cliff Schrage. It's a  
22 difficult one.

23 Q. Sorry. I apologize. Did you  
24 learn anything from reading that transcript that

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1 you were unaware of before reading it?

2 A. No.

3 Q. And what about Naomi's transcript,  
4 after reading Naomi's transcript, did you learn  
5 anything different than what you had known prior  
6 to reading it?

7 A. No, I did not.

8 Q. And Pastor Forseth -- I probably  
9 mispronounced --

10 A. Forseth, yes.

11 Q. Thank you. After reading that  
12 transcript, did you learn anything that you were  
13 unaware of prior to your review of it?

14 A. No, I did not.

15 Q. Okay. Thank you.

16 A. Thank you.

17 Q. Other than your counsel, have you  
18 discussed this case with anyone else?

19 A. My wife Diane.

20 Q. And when did you have those  
21 discussions with Diane?

22 A. I'm sorry?

23 Q. I'm sorry. When did you have  
24 those discussions with Diane?

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1 A. Over the course of several weeks.

2 Q. Do you know approximately when in  
3 time those conversations took place?

4 A. I had a conversation with her  
5 early this morning, just before she prayed for  
6 me, and probably last week, just prior to the  
7 funeral, we dialogued a bit about it.

8 Q. And what did you talk about  
9 specifically with Diane?

10 MR. LESSER: I'm going to raise an  
11 objection to that. I'm going to --  
12 spousal privilege, so I don't think it's  
13 appropriate to ask him those questions,  
14 Hillary.

15 MS. NAPPI: Okay. So are you  
16 directing him not to answer?

17 MR. LESSER: Well, I don't want  
18 to -- I don't want to turn the objection  
19 into anything that -- more than it needs  
20 to be, so I'm going to raise the  
21 objection, I'm going to allow him to  
22 answer the question, preserving all  
23 rights and not waiving spousal privilege  
24 or anything like that.

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1 BY MS. NAPPI:

2 Q. Okay. So, Pastor Zarlengo, if you  
3 could answer the question, please?

4 A. Sure. It was basically issues of  
5 how we should pray for the meeting. A core value  
6 that I have, that's deep in my soul, and it's  
7 reflected in my leadership here for the past 31  
8 years, is we pursue truth, and we want nothing  
9 but the truth, and we feel that the only way we  
10 can achieve that is going down a path of  
11 transparency, and so Diane and I spoke about a  
12 passage in the New Testament in the words of  
13 Jesus, in Matthew, the Gospel of Saint Matthew,  
14 in chapter six, verse 22, we actually spoke about  
15 that where Jesus said that -- that if the eye is  
16 good, open, unfolded, it will be full of light,  
17 and so that's -- and we just prayed that we would  
18 always walk in that truth, and that that would --  
19 that would create a fullness of light in every  
20 situation, so it was more of a spiritual dialogue  
21 for us, and that culminated in prayer.

22 Q. Okay. And at any time -- and I'm  
23 going to use a time reference to try to narrow  
24 this a little bit -- prior to the Grace

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1 investigation, did you discuss Ms. Volkel's  
2 allegations with Diane?

3 A. Yes.

4 Q. And do you know approximately when  
5 that was?

6 A. Oh, it was over a course of time,  
7 to be honest with you. We're married, we talk  
8 every day 24/7 over the past 42 years, so, yes,  
9 we did. You know, we would share with one  
10 another our hearts, again of wanting to pursue  
11 truth, and to see everyone that was involved, you  
12 know, healed.

13 Q. And when Ms. Volkel's allegations  
14 first came to light, was this a difficult thing  
15 for both you and Diane to hear?

16 A. Very difficult.

17 Q. And did you both pray throughout  
18 this process regularly about this issue?

19 A. Yes. It was brought to my wife's  
20 attention by Pastor Linda Lecci, who's a good  
21 friend of my wife and myself. My wife encouraged  
22 her to contact me, and Pastor Linda Lecci did  
23 contact me, and that's when I first heard about  
24 all of this, and it was a heartbreak, absolutely

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1 a heartbreak, and we wanted to pursue the truth  
2 regarding this matter.

3 Q. And other than your counsel, and  
4 other than Diane, did you speak about today's  
5 deposition with anyone else?

6 A. I informed my leadership to pray  
7 for me, since I was representing not only myself  
8 personally, but our church, so I invited the  
9 chairman of my trustee board, the chairman of our  
10 deacon board, the chairman of our deaconess  
11 board, the chairman of our elder board, to invite  
12 those members of their respective boards to pray  
13 for today.

14 Q. And can you just provide me with  
15 the names of those chairman that you just  
16 identified?

17 A. Yes. The chairman of the trustee  
18 board is Marc Conti. Do you want me to spell, or  
19 just --

20 Q. That would probably be helpful for  
21 Kim, if you don't mind.

22 A. Marc, M-A-R-C, Conti, C-O-N-T-I.  
23 And then, the chairman of the deaconess board  
24 Marie Gebbia, G-E-B-B-I-A. And then, the

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1 chairman of the elder board is Ken Metzler,  
2 M-E-T-Z-L-E-R. Okay. The chairman of the  
3 trustees, deacon -- and the deacon board is Lou  
4 Samaritano. I know I'm Italian and he's Italian,  
5 but you'll have to give it your best shot at  
6 spelling that one.

7 Q. And you just testified that you  
8 were here today representing not only SGT, but  
9 yourself; is that correct?

10 MR. LESSER: Objection. He's here  
11 in personal capacity, and he's been  
12 designee for the organization.

13 MS. NAPPI: I understand that. I  
14 want to know if he understands though  
15 that he is not an individual named in  
16 this lawsuit --

17 BY MS. NAPPI:

18 Q. -- and you are not a defendant in  
19 this case. You understand that, correct?

20 A. Yes.

21 Q. Okay. Thank you. Other than the  
22 interviews that we talked about that were  
23 conducted by the Grace organization, did you read  
24 any other documents to prepare for today's

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1 deposition?

2 A. No.

3 Q. Were any documents read to you?

4 A. No.

5 Q. And have you reviewed Ms. Volkel's  
6 deposition transcript?

7 A. I did not thoroughly read through  
8 it. I read through maybe about 50 to 60 percent  
9 of it, more of a superficial read.

10 Q. And from the 60 percent or so of  
11 Ms. Volkel's deposition transcript that you read,  
12 did you learn anything that you were unaware of  
13 prior to reading that transcript?

14 A. A few pieces of information, just  
15 a little bit about her past that I wasn't aware  
16 of, and then there was specific questions about  
17 when she received counsel and such that I wasn't  
18 fully aware of all the names of the individuals.

19 Q. Okay. What details about her past  
20 were you unaware of?

21 A. It would be probably a little bit  
22 with her education -- I'm trying -- I'm sorry --  
23 that would be about it.

24 Q. Okay. And when you said when she

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1 first received counsel, what do you mean by that?

2 I'm sorry.

3 A. When she had shared with her  
4 therapist, I think the name of the therapist may  
5 have been presented, I don't remember, but it was  
6 kind of new. I knew she had shared with her  
7 therapist, but there was additional information  
8 that I wasn't aware of that -- when I read it.

9 Q. And what information were you  
10 unaware of that you first learned reading the  
11 transcript?

12 A. I thought it was the mention of  
13 the therapist's name, but I don't recall. I'm  
14 sorry.

15 Q. That's okay. Thank you very much  
16 for trying to answer. Have you signed any  
17 agreements with anyone about discussing this  
18 matter, other than your counsel?

19 A. No.

20 Q. And at any point in time have you  
21 discussed Ms. Volkel's allegations with any  
22 reporters?

23 A. Report -- can you clarify?

24 Q. Sure. At any point in time, have

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1 you discussed Ms. Volkel's allegations with any  
2 members of the media?

3 A. The media, during the time when  
4 Grace was doing the investigation, the Smithtown  
5 News, because of my relationship in the  
6 community, contacted me and asked me about the  
7 allegations, what we as a church were doing, and  
8 so I shared with the Smithtown News what we  
9 were -- what we had implemented with the Grace  
10 investigation, and that we wanted to maintain a  
11 high level of credibility and transparency in our  
12 pursuit of the truth regarding this entire  
13 matter. That was probably the extent of the  
14 conversation, and they actually put that in the  
15 newspaper.

16 Q. Do you remember what year,  
17 approximately, that was?

18 A. I would believe it was 2018.

19 Q. Okay. And when you were having  
20 these conversations with people from the  
21 Smithtown News, did you provide any documents to  
22 them?

23 MR. LESSER: Objection to form.

24 Mischaracterizes his testimony. You can

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1 answer over the objection.

2 THE WITNESS: So I'm confused on  
3 what I'm supposed to do.

4 MR. LESSER: Yeah, I objected to  
5 the form, because --

6 MS. NAPPI: I'll just rephrase.

7 BY MS. NAPPI:

8 Q. When you were communicating with  
9 the Smithtown News, did you provide any documents  
10 to the Smithtown News about the church's actions  
11 with respect to Ms. Volkel's allegations?

12 A. I did. In my second conversation  
13 with them, I felt that I could synthesize and  
14 create a higher level of clarity by sending an  
15 email, and I basically explained to them what I  
16 just mentioned to you now.

17 Q. Do you still have that email?

18 A. I'm sure it's somewhere in the  
19 computer.

20 MS. NAPPI: We're going to make a  
21 demand for that, to the extent it hasn't  
22 been produced.

23 MR. LESSER: I'll take it under  
24 advisement.

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1 BY MS. NAPPI:

2 Q. And I should have asked you this  
3 earlier, but have you ever testified in court  
4 before?

5 A. I have not.

6 Q. And have you ever been deposed  
7 before?

8 A. I have not. This is virgin  
9 territory for me.

10 Q. It's not going to be too bad, I  
11 promise. Have you ever been a plaintiff, or a  
12 defendant in a lawsuit before?

13 A. I have not.

14 Q. And do you use social media?

15 A. I do not.

16 Q. And so no Instagram account?

17 A. I have no Instagram, even though I  
18 -- I've got seven grandchildren and children,  
19 they make good use of it.

20 Q. So you know what it is, so you're  
21 ahead of the game, which is good --

22 A. Yes.

23 MR. LESSER: He's ahead of the  
24 game because he doesn't use it.

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1 MS. NAPPI: I'm not going to put a  
2 comment on the record about that.

3 BY MS. NAPPI:

4 Q. Do you have Facebook, sir?

5 A. Do I? No, I do not, but my wife  
6 does, my wife does.

7 Q. And do you ever use your wife's  
8 account?

9 A. Never.

10 Q. So is it just kind of like if  
11 something pops up on her Facebook, she may show  
12 you it?

13 A. Correct. And it's usually  
14 pictures of the grandkids.

15 Q. Understood. I'm going to assume  
16 you do not use Twitter?

17 A. I do not.

18 Q. Have you ever posted any  
19 statements about this case or Rachel Volkel on  
20 any form on the internet?

21 A. I have not.

22 Q. Do you keep notes about your  
23 workday, sir?

24 A. I do not.

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1 Q. I'm going to just circle back, and  
2 I think you testified earlier that you graduated  
3 in 1982. Did I get that correct?

4 A. Yes. I did my undergrad 1976 to  
5 1980, and then my graduate studies from 1980 to  
6 1982.

7 Q. And prior to completing your  
8 graduate studies, did you have any jobs?

9 A. Yes. I worked at a convenience  
10 store, and, during the summers, landscaping.

11 Q. Okay. But prior to your  
12 graduation of your graduate studies in 1982, you  
13 had no theological jobs, correct?

14 A. That's correct.

15 Q. And what was --

16 A. That was --

17 Q. I'm sorry. Please, go ahead?

18 A. I worked in a church, and for  
19 different ministries, but it was all volunteer.

20 Q. Okay. And after your graduation  
21 in 1982, what was your first theological job?

22 A. I worked as a faculty member and  
23 the assistant dean of men at Christ For the  
24 Nations in Dallas, Texas.

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1 Q. And how long did you work for  
2 Christ For the Nations?

3 A. I worked there in Dallas for six  
4 years, and then I moved up to New York and worked  
5 for another four years. My position in the New  
6 York school, which was called Christ the Nation's  
7 Institute of Biblical Studies in Stony Brook,  
8 Long Island, New York, I was the dean of students  
9 and a faculty member.

10 Q. Okay. And so let's just break  
11 this down a little bit. When you were a faculty  
12 member, what were your job duties?

13 A. To teach a variety of theological  
14 and biblical courses.

15 Q. And what was the average age of  
16 your students?

17 A. The average age was between 18 and  
18 45.

19 Q. Okay. So you taught adults, not  
20 children?

21 A. Yes, all adults.

22 Q. Okay. And was that the same job  
23 description when you were a faculty member in New  
24 York --

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1 A. Yes.

2 Q. -- for Christ --

3 A. Yes. My responsibilities  
4 increased, because I became the dean of students,  
5 not assistant dean of men, but I was now dean of  
6 students at the school in New York.

7 Q. And what were your additional  
8 responsibilities?

9 A. It was supervising the behavior  
10 and the conduct of the students as the dean, not  
11 academic, but behavioral.

12 Q. And were these adult students or  
13 minor students?

14 A. All adults, all over the age of  
15 18.

16 Q. Okay. And in your employment for  
17 approximately ten years with Christ the Nation,  
18 did you receive any specific training about  
19 sexual abuse or sexual assault?

20 A. No direct training on that, other  
21 than from Holy Scripture, and how we should  
22 behave toward one another inter-relationally with  
23 adults and children.

24 Q. And can you describe what the Holy

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1 Scripture taught you about how specifically  
2 adults should behave toward children, in regard  
3 to sex?

4 A. The highest level of integrity, a  
5 conduct that would be noteworthy by its moral and  
6 ethnical standards.

7 Q. So I'm not as educated as you on  
8 this topic, so can you break that down a little  
9 bit more for me, and sort of explain it in a way  
10 that a layperson would understand what a highest  
11 level of integrity means?

12 A. Sure. That you would always make  
13 sure that your interaction with a child or a  
14 minor would be pure, would be moral, would be  
15 ethical in conversation, in any type of physical  
16 behavior, and definitely no sexual misconduct  
17 with a child.

18 Q. And is this an individual  
19 interpretation of reading the scripture?

20 A. I would say it's a broad practical  
21 application from Holy Scripture, because we're  
22 constantly exhorted in the Bible to honor and  
23 esteem and respect children. Even Jesus gives a  
24 very serious warning that if you behave

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1 inappropriately toward a child by leading them  
2 down a path of description, hurting them  
3 emotionally, psychologically, spiritually or  
4 physically, sexually, that a great judgment would  
5 come upon you, and so we're sobered by that  
6 exhortation, so in my personal life, you know,  
7 that's how we reared our own children, and my  
8 grandchildren, and in our society I'm hyper  
9 protective of them.

10 Q. Okay. So just bear with me a  
11 little bit, because I want to understand what  
12 you're saying in terms of how other pastors would  
13 receive the same education, okay. And so if I  
14 ask a question in a way that you don't understand  
15 it, please just tell me. I'm happy to rephrase  
16 it. I'm not trying to trick you. I'm just  
17 trying to understand. I am not as well versed in  
18 this level of theological study as you, so just  
19 bear with me a little bit. Okay?

20 Would you then say that each  
21 pastor who is in a position to work with children  
22 for spiritual guidance has to interpret the  
23 scripture on their own, and apply that  
24 interpretation to their behavior?

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1 MR. LESSER: Objection. I don't  
2 think that's an appropriate question.

3 MS. NAPPI: I'm asking for his  
4 opinion, so if he understands the  
5 question, I think he can answer that.

6 MR. LESSER: No, I think you  
7 can -- I'm not going to allow him to  
8 opine about the generality that you're  
9 asking about, Hillary. I don't think  
10 that's an appropriate --

11 MS. NAPPI: Okay. I'll rephrase.

12 BY MS. NAPPI:

13 Q. Is there, besides the Holy  
14 Scripture, any written guidance that pastors  
15 receive about how to behave with respect to  
16 children and sex?

17 MR. LESSER: Same objection. You  
18 haven't defined pastor, so it's a very  
19 broad question you're asking.

20 MS. NAPPI: Okay.

21 BY MS. NAPPI:

22 Q. Do you understand the question,  
23 sir?

24 A. I do.

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1 Q. Okay. Can you answer the question  
2 then, if you understand it, please?

3 MR. LESSER: I'm not going to  
4 allow him to answer the question. You  
5 can rephrase it, but you haven't defined  
6 the scope of what you're asking him. You  
7 asked a very broad general question about  
8 pastors generally, and I don't know what  
9 denomination you're talking about --

10 BY MS. NAPPI:

11 Q. Sir, how long have you been a  
12 pastor, sir?

13 A. I have been pastoring here at  
14 Smithtown Gospel Tabernacle since 1991, and this  
15 is the year 2022, which would be 31 years.

16 Q. I was going to say, I'm bad at  
17 math, but that's approximately 30 years, right?

18 A. Yes.

19 Q. So in the 30 years of your  
20 pastoring at Smithtown specifically, did you ever  
21 guide other individuals who are pastoring in how  
22 to be pastor?

23 A. Yes.

24 Q. And would you say, sir, that you

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1 were a mentor for other pastors in your 30-year  
2 career with Smithtown Tabernacle?

3 A. I would humbly say yes.

4 Q. And so based on that experience,  
5 is there guidance, other than the Holy Scripture,  
6 that you point pastors to with respect to how  
7 they should behave when dealing with children and  
8 the issue of sex?

9 A. Yes.

10 Q. And can you, please, tell me what  
11 that authority is?

12 A. The primary authority, of course,  
13 is Holy Scripture, and everything that's  
14 presented as far as the standard for a minister  
15 that's recorded in the gospel, in the epistle  
16 penned by the Apostle Paul to Timothy in First  
17 Timothy chapter three, when he gives 16  
18 qualifications for a pastor. Of the 16, 15 have  
19 to do with character. One has to do with talent  
20 or ability to teach. In addition to that  
21 passage, and a myriad of others, we also  
22 implemented here at Smithtown Gospel  
23 Tabernacle -- although, we're not a denomination,  
24 we're part of a fellowship called the Fellowship

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1 Christian Assemblies -- we implemented in 2005 a  
2 training program calls CAPSS, Child Abuse  
3 Protective Service and Seminars, so there was  
4 very extensive training that was presented to the  
5 pastoral staff, and then extended to all of our  
6 board members, and to -- at that time, we were  
7 running probably about 150, now we have about 250  
8 leaders, and all of them were required to go  
9 through that training.

10 Q. Okay. And so CAPSS began in 2005,  
11 correct?

12 A. Yeah. A formal development of  
13 that was in 2005. It continued to be refined  
14 more and more after that. Prior to that, I would  
15 confidently say we adhered to the very same  
16 principles, though it wasn't formal, of the  
17 behavior toward the children based, again, on the  
18 very clear admonitions given in scripture.

19 Q. Okay. And other than the  
20 admonitions given in scripture, was that  
21 memorialized in any other way before 2005, as a  
22 quote/unquote policy?

23 A. As far as a written policy, no.  
24 As far as a strong verbal policy, when it came to

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1 accountability with the pastors, elders, deacons  
2 deaconesses, yes, ongoing daily, and we have a  
3 very, very high standard in our moral and ethical  
4 behavior, and, you know, we rely on the grace of  
5 God to empower us to do that, not only with  
6 adults, but especially with children.

7 Q. Okay. So go just a little bit  
8 back. So if I'm doing the math right, you worked  
9 for Christ Nation for approximately ten years, so  
10 what year did you join Smithtown Tabernacle?

11 A. 1991.

12 Q. 1991. Thank you. And when you  
13 first joined, what was your official position?

14 A. I was the pastor over missions and  
15 evangelism.

16 Q. Okay. And what were your job  
17 duties in that role?

18 A. In that role, I would work with  
19 our home and foreign missionaries. Home  
20 missionaries being those that were local within  
21 the state of New York, and in the United States,  
22 and foreign missionaries, those were the  
23 international missionaries. At the time we maybe  
24 had about 25. Now we have about 55. I was

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1 working with them. When it came to evangelism,  
2 it was training our leadership, as well as those  
3 in our coronation that wanted to, on how to share  
4 your faith, how to share the good news of Jesus  
5 Christ with others.

6 Q. Okay. And when you joined SGT in  
7 1991, this was a paid position, correct?

8 A. Yes, it was.

9 Q. Okay. And did you fill out a job  
10 application, prior to being hired?

11 A. Actually, Pastor Forseth, who was  
12 the senior pastor, did not require an application  
13 to be filled out. He would have a -- those who  
14 were brought on his staff were interviewed by the  
15 elder board that was made up of about five or six  
16 individuals, and then we have a board that's  
17 called the combined board, and that's made up of  
18 our elders, our deacons, and our trustees. It  
19 would be a number of about 25 individuals, and  
20 they would interview you, and then you would be  
21 hired, and the membership -- the membership then  
22 would also have to vote you in, so it was a long  
23 process, but it was a thorough process. So even  
24 though there wasn't a formal written application,

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1 you had to have a background analysis and  
2 evaluation, and then a formal interview with the  
3 elders, and the combined board, and then voted on  
4 by the membership.

5 Q. Okay. And can you describe the  
6 background analysis and evaluation that you just  
7 mentioned?

8 A. Yes. It was your training as far  
9 as your education. The ministry that you  
10 participated in most of the time was volunteer  
11 within the context of the church. In my case, I  
12 had worked for ten years, as you mentioned, at  
13 Christ For the Nations, in a Bible college, so  
14 they would evaluate, you know, how productive,  
15 how fruitful my character, and also they would  
16 inquire of individuals that I worked or  
17 ministered with, just, you know, their -- their  
18 reference of me.

19 Q. And there was no written  
20 application at this point, right?

21 A. There was not.

22 Q. Okay. And so do you know if the  
23 references you provided were checked?

24 A. To the best of my knowledge,

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1 Pastor Forseth was thorough when it came to that,  
2 because he -- he was a man of integrity, and very  
3 cautious on who would be brought into the  
4 position, so I would assume -- it's conjecture,  
5 but I would assume, based on the man that I know  
6 him to be, that he checked on those references,  
7 and they came out, well, good, so he brought me  
8 on.

9 Q. So you've been, up until recently  
10 it sounds like, involved with SGT for  
11 approximately 30 years, correct?

12 A. Yes. For 31 years, and they  
13 graciously had a big appreciation dinner with a  
14 lot of the political leaders in the area, and the  
15 community, and our congregation.

16 Q. And so in that 31-year career with  
17 them, did you participate in the hiring of  
18 another pastor at any point?

19 A. In my 31 years?

20 Q. Yes.

21 A. Yes, the 22 of those years I was  
22 the senior pastor, and I brought on about 14 to  
23 15 different pastors.

24 Q. Okay. So when you were in the

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1 process of hiring any one of those pastors, was  
2 there a written application for those pastors to  
3 apply to work for you?

4 A. Yes.

5 Q. Okay. And were those files  
6 maintained by SGT?

7 A. To the best of my knowledge, my  
8 secretary was pretty copious in note taking and  
9 filing my material. She died suddenly just  
10 several years -- well, about ten years ago, so  
11 the applications, I probably could find them, but  
12 it would take me a little bit of time.

13 Q. And I'm not asking you to do that,  
14 sir. I just want to know if those pastors had an  
15 employment file with SGT?

16 A. Could you restate that? I'm  
17 sorry.

18 Q. Sure. The pastors that you hired,  
19 did they have an employment file with SGT?

20 A. Yes. Employment file being an  
21 application form that they had to fill out, and  
22 then some of our interviews that we did with  
23 them.

24 Q. Okay. And at any point in time in

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1 your 31 years there, did you see your own  
2 employment file?

3 A. Oh, my own employment file? No.

4 Q. Yes, sir. Do you know if SGT  
5 maintained employment files at the time that you  
6 were hired?

7 A. No. To the best of my knowledge.

8 Q. And so to the best of your  
9 knowledge, there is no formal employment file for  
10 Ron Braaten, correct?

11 A. That's correct.

12 Q. Okay. And Mr. Braaten was hired  
13 at the time that Pastor Forseth was running SGT;  
14 is that correct?

15 A. That is correct. In 1985, Ron  
16 replaced Pastor Mike Hickey. He was the youth  
17 pastor. He went onto teach at a local Christian  
18 school, and Pastor Ron Braaten was hired on in  
19 1985, under the leadership of Senior Pastor  
20 Robert Forseth.

21 Q. So when you were working at SGT,  
22 Mr. Braaten was already working for SGT?

23 A. Yes. I worked with Ron probably  
24 for six years.

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1 Q. Okay. So when you were first  
2 hired, other than your role at this -- that you  
3 talked about at SGT with your duties as pastor  
4 over ministries, at what point in time did you  
5 become more involved in the administration of  
6 SGT?

7 A. I became the senior pastor, if  
8 that's what you're asking.

9 Q. Okay. Is that the role that  
10 brought you into the administrative  
11 responsibilities at SGT?

12 A. In 1991 I came on as the missions  
13 pastor, and my area of ministry was with  
14 missionaries, as I mentioned, and evangelism. In  
15 2000, I became the senior pastor, and in our  
16 church governance that means I'm over all of the  
17 associate pastors, and over all the boards, and  
18 all the ministries, about 100 ministries we have  
19 in the church, and the congregation at large, but  
20 I'm accountable to the elder board and the  
21 combined board.

22 Q. Understood, sir. At the time you  
23 joined SGT in 1991, how many ministries did SGT  
24 have then?

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1 A. Approximately, 40.

2 Q. How many ministries does it have  
3 now?

4 A. About 115.

5 Q. Wow.

6 A. There's a lot of needs, and a lot  
7 of hurting people, and our conviction here is to  
8 help. They know my motto, look for someone to  
9 help every day, look for someone -- you know,  
10 snap the back of self-centeredness.

11 Q. Do you remember when the lawsuit  
12 that you're here testifying about was filed?

13 A. When this lawsuit was filed?

14 Q. Yes.

15 A. It was upon my return from a  
16 sabbatical that I had gone on. I think that was  
17 2019. I was gone in the month of June, July and  
18 August, and upon my return in September -- no, I  
19 think it was in October, the lawsuit was filed  
20 from Rachel and family. I may have the date  
21 wrong. I thought it was 2019 in October.

22 MS. NAPPI: So I'm going to ask  
23 the reporter to mark plaintiff's exhibit  
24 one for evidence, and then pull it up on

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1 the screen, please. And that's the  
2 Complaint, just in case everyone doesn't  
3 have the description of exhibit one, two,  
4 whatever.

5 BY MS. NAPPI:

6 Q. Pastor Zarlengo, can you see this  
7 okay?

8 A. Sorry. Yes, I can.

9 Q. Okay. So I'm going to ask if the  
10 court reporter or the tech could you give you  
11 control of the screen so that you can scroll on  
12 the document.

13 A. That I would --

14 MR. LESSER: No, we're going to  
15 let the court reporter --

16 THE WITNESS: Okay.

17 MR. LESSER: You can just look at  
18 the screen right now.

19 THE WITNESS: Do you want me to  
20 read this?

21 BY MS. NAPPI:

22 Q. Yeah, I just want you to take a  
23 minute and review it, so you can let whoever has  
24 got control of the screen know when to move the

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1 cursor down. You don't have to read every word,  
2 sir. I just want you to review it.

3 A. Okay. I'm a slow reader, so I  
4 don't know how long this is, but --

5 MR. LESSER: Yeah, Hillary, do you  
6 want him reading --

7 MS. NAPPI: No, sir. I just want  
8 him to review this document generally to  
9 see the whole thing. He does not have to  
10 read every word.

11 THE WITNESS: Okay. You can keep  
12 moving it up then.

13 (At this time, the witness  
14 complies with request.)

15 THE WITNESS: Okay.

16 BY MS. NAPPI:

17 Q. Okay. Thank you. You're done  
18 reviewing, correct?

19 A. Yes, this was my first reading  
20 this.

21 Q. So do you recognize this document  
22 then?

23 A. Can you restate that?

24 Q. Do you recognize this document?

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1 A. Now at this immediate moment, yes.

2 Q. And was this the first time that  
3 you have seen this document, sir?

4 A. Yes.

5 Q. And what do you recognize the  
6 document to be?

7 A. A Complaint from the plaintiff  
8 Rachel Volkel.

9 Q. And did you ever discuss this  
10 Complaint specifically with anyone, other than  
11 your counsel?

12 A. I think -- I'm sorry, I need you  
13 to refine what you mean by that. I'm not sure I  
14 understand what you're asking.

15 Q. Do you recall receiving this  
16 document at any point in time?

17 A. No.

18 Q. Do you know what the Child  
19 Victim's Act is, sir?

20 A. I don't know in detail, from a  
21 legal standpoint.

22 Q. And that's not what I'm asking  
23 you, so I'll be a little bit more specific for  
24 you. Okay?

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1 A. Okay.

2 Q. You understand that Ms. Volkel  
3 brought her lawsuit pursuant to the Child  
4 Victim's Act, correct?

5 MR. LESSER: Objection.

6 BY MS. NAPPI:

7 Q. Do you understand my question,  
8 sir?

9 A. I don't.

10 Q. Okay. What's your understanding  
11 of the Child Victim's Act?

12 A. I don't have any understanding of  
13 it.

14 Q. Did you ever hear the term the  
15 Child Victim's Act before today?

16 A. I have not.

17 Q. Do you know if any decision makers  
18 at SGT first learned of the Child Victim's Act,  
19 prior to this lawsuit?

20 A. I'm sorry, could you ask that  
21 again?

22 MS. NAPPI: Sure. Kim, can you  
23 just repeat my question?

24 (At this time, the court reporter

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1 read back from the record as was  
2 requested.)

3 THE WITNESS: No.

4 BY MS. NAPPI:

5 Q. Do you know if any decision makers  
6 at SGT know what the Child Victim's Act is?

7 MR. LESSER: Same objection.

8 THE WITNESS: That would be  
9 conjecture. I don't know the mind of all  
10 of my -- I've got a lot of leaders.

11 BY MS. NAPPI:

12 Q. Have you ever had any  
13 conversations with any decision makers at SGT,  
14 about the Child Victim's Act?

15 A. No.

16 Q. At what point in time did you know  
17 that Ms. Volkel made allegations about sexual  
18 assault that she suffered at the hands of Ron  
19 Braaten?

20 MR. LESSER: Allegations in a  
21 pleading or?

22 MS. NAPPI: Just generally.

23 MR. LESSER: Okay. So not the  
24 lawsuit filing, she's asking the

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1                   general --

2                   THE WITNESS: So if I understood  
3                   you correctly, Hillary, you're asking me  
4                   when I first was made aware of the  
5                   allegation that Rachel was abused by Ron  
6                   Braaten?

7 BY MS. NAPPI:

8                   Q.       Yes, sir.

9                   A.       I was made aware of that via a  
10                  phone call that came by Pastor Linda Lecci.

11                  Q.       Do you know what year that was,  
12                  sir?

13                  A.       I believe that was in the spring  
14                  of 2017.

15                  Q.       And is it your testimony today  
16                  that from 2017 until 2019, when this Complaint is  
17                  dated, that you did not know what the Child  
18                  Victim's Act was?

19                  MR. LESSER: Same objection.

20                  Object to form. What you call the Child  
21                  Victim's Act -- you can answer over  
22                  objection, if you understand the  
23                  question, but I'm not waiving that  
24                  objection. I don't think it's a proper

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1                   formed question.

2                   MS. NAPPI:   Okay.   Your objection  
3                   is on the record.

4                   MR. LESSER:   Do you understand the  
5                   question?

6                   THE WITNESS:   I'm sorry, I'm a  
7                   little perplexed and confused.   I'm being  
8                   asked about this act, I mean, do I --

9   BY MS. NAPPI:

10                  Q.        I'm going to define it for you.  
11   So the New York State Child Victim's Act is a law  
12   that allows survivors of sexual abuse that  
13   occurred when they were minors to have a limited  
14   window to file lawsuits that were once time  
15   barred, or extended the statute of limitations  
16   for current children.   Okay?   Can we accept that  
17   understanding right now for today?

18                  A.        Yes.

19                  MR. LESSER:   Object to the form,  
20                  but your general description is what it  
21                  is.

22   BY MS. NAPPI:

23                  Q.        Okay.   And so at any point in  
24   time, from when you first learned from Pastor

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1    Lecci that Rachel was making an allegation of  
2    sexual abuse, until the date that you received  
3    this Complaint, or that the Complaint was filed,  
4    since you're not sure you received it personally,  
5    did you learn about the ability of survivors to  
6    sue because of past abuse?

7           A.       In a general knowledge, I knew  
8    that something like that could occur, but, no, I  
9    don't know the formal act, and I didn't -- I did  
10   not anticipate any lawsuit coming from this, to  
11   be honest with you.

12          Q.       Why didn't you anticipate that,  
13   sir?

14          A.       Well, after the Grace  
15   investigation, and their conclusion that we were  
16   not aware of any of this behavior, and that we  
17   were not negligent in our oversight with Ron  
18   Braaten, that we really were pretty confident  
19   that was a settled issue. And then, on the heels  
20   of the Grace investigation and their conclusion,  
21   I communicated that to our congregation, and then  
22   we decided to actually meet with Pastor Linda  
23   Lecci, Pastor Joe Lecci, and the Volkel family,  
24   and it was my opportunity now finally to dialogue

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1 with them, because the Grace organization had  
2 restricted me from having any correspondence, any  
3 communication, any conversation, I know that  
4 disturbed her family and Rachel, but I was under  
5 the directive from Grace not to do that, and so  
6 we met together, and in that meeting there were  
7 prayers and tears, and it was, I felt, a good  
8 closure moment.

9                   Again, I could never conclude  
10 that, you know, Ron had done it, or that she had  
11 actually experienced it, but I definitely knew  
12 she had gone through a horrific season of pain,  
13 and we wanted to be there to help. And at that  
14 time or after, we said we want to be able to  
15 help, that's just the nature of our congregation,  
16 our leadership, I told you that's our motto, our  
17 core value, and so we said, you know, the pain  
18 you've gone through, we just want to be able to  
19 help, and so we had mentioned that we would give  
20 some type of financial assistance, and then I  
21 went on my sabbatical, and upon my return we were  
22 going to, as a combined board, discuss that, but  
23 then the lawsuit came.

24                   Q.       Did you ever receive any

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1 correspondence from Ms. Volkel, prior to the  
2 filing of the lawsuit, about the fact that she  
3 intended to sue?

4 A. No, no correspondence at all.

5 Q. If I were to tell you right now  
6 that my office sent correspondence to the church  
7 prior to the filing of this lawsuit that was  
8 unresponded to, would that surprise you?

9 A. That something was sent to the  
10 church, indicating that a lawsuit was  
11 forthcoming?

12 Q. Yes, sir.

13 A. I would be shocked, but I was gone  
14 for three months on a sabbatical. How was it  
15 sent to the church?

16 Q. I'm not going to get into that.  
17 I'm just asking you if you would be surprised to  
18 know that?

19 MR. LESSER: Objection. So you're  
20 asking a hypothetical?

21 BY MS. NAPPI:

22 Q. Would you be surprised to know  
23 that correspondence was sent to the church, prior  
24 to the filing of this lawsuit, that was

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1 unresponded to?

2 MR. LESSER: Objection. Form and  
3 foundation. I don't think it's an  
4 appropriate form of the question, but you  
5 can answer, if you understand the  
6 question.

7 THE WITNESS: Would I be in shock?  
8 They inform me of most everything as a  
9 senior pastor, and this would be a high  
10 level of concern. I would have assumed  
11 if some correspondence was sent to the  
12 church during that time I was on  
13 sabbatical, upon my return I would have  
14 been informed.

15 BY MS. NAPPI:

16 Q. You said that you met with the  
17 Volkel family in an effort for SGT to provide  
18 help to Ms. Volkel after the Grace report was  
19 concluded --

20 MR. LESSER: Can you -- I'm sorry,  
21 Hillary, can you pull down -- if you're  
22 not using the Complaint, can you pull  
23 that down?

24 MS. NAPPI: Oh, yeah, we can do

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1                   that.

2                               MR. LESSER: Thank you. It's  
3                   distracting.

4 BY MS. NAPPI:

5                   Q.       Sorry about that.

6                   A.       Okay. I couldn't see any of you.

7                   Q.       Okay. So prior to the lawsuit  
8 being filed, but after the Grace report was  
9 concluded, you testified that you met with the  
10 Volkel family in an effort to help heal; is that  
11 correct?

12                  A.       I was in touch with Pastor Linda  
13 Lecci, who allowed me to have a sensitivity to  
14 the emotional state of the family, and after  
15 receiving her counsel and advice, she said I  
16 think this would work well, I think it would be a  
17 beautiful act of love and kindness from yourself,  
18 and from the church leadership, and so I said,  
19 okay, based on your direction again -- again,  
20 that's Pastor Linda Lecci, that's where Rachel  
21 attends, and that was the pastor who counseled  
22 her, we decided we're going to do that, and we  
23 met with Rachel, her mom and dad, her sister  
24 Naomi, Tommy the brother-in-law, I brought with

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1 me Pastor Derek Prezzano, the executive pastor,  
2 Pastor Ted Bichsel, the counseling pastor here at  
3 the church, and my wife attended, along with  
4 Pastor Derek's wife Debby, and there may have  
5 been one or two other individuals, I don't  
6 remember. We met in a group, in a circle, and we  
7 were able to just share, bear our hearts and pray  
8 together. It was a really -- a beautiful time  
9 together, and Pastor Linda Lecci and Joe Lecci  
10 concurred that they felt it was --

11 Q. And -- I'm sorry, I don't mean to  
12 cut you off.

13 A. -- that it was a very profitable  
14 time for emotional healing, especially for  
15 Rachel.

16 Q. And I believe you used the term,  
17 and if I'm misstating it, feel free to tell me,  
18 that you believed that this session was settling  
19 this issue for Ms. Volkel; is that correct?

20 MR. LESSER: Objection to form.

21 THE WITNESS: Yeah, I don't  
22 know if I -- I would say it was -- I  
23 felt, from my own personal perspective,  
24 as a person, as a pastor, I felt for

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1 Rachel it was healing. She came up to me  
2 and hugged me at the end of the time.

3 MS. NAPPI: And I'm going to ask  
4 the court reporter to mark plaintiff's  
5 exhibit two, it's the answer is how it  
6 might be labeled.

7 MR. LESSER: Hillary, could we  
8 take a five-minute bathroom break, if  
9 that's okay?

10 MS. NAPPI: Absolutely. Take  
11 however long you need.

12 MR. LESSER: I just need five  
13 minutes. Thank you.

14 (At this time, a short break was  
15 taken.)

16 THE WITNESS: Okay. You want me  
17 to read the document?

18 BY MS. NAPPI:

19 Q. Just review it, you do not need to  
20 review it verbatim.

21 (At this time, the witness  
22 complies with request.)

23 BY MS. NAPPI:

24 Q. Okay. Thank you for reviewing

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1 that. Do you recognize the document which has  
2 been marked exhibit two?

3 A. Yes.

4 Q. Okay. And what do you recognize  
5 this document to be?

6 A. The response from our attorneys.

7 Q. Okay. And without telling me the  
8 sum and substance of any conversation you had  
9 with counsel, did you participate in helping your  
10 counsel prepare this response?

11 A. Yes.

12 Q. And I just want to ask if we can  
13 scroll down to the fifth affirmative defense,  
14 please. Okay. Pastor Zarlengo, do you see where  
15 it says as for a fifth affirmative defense, and  
16 then there is a sentence that is labeled number  
17 125?

18 A. As for a fifth affirmative  
19 defense number 125, yes.

20 Q. Okay. I'm just going to ask you  
21 to read that sentence, please.

22 A. Plaintiff failed to mitigate,  
23 obviate, diminish or otherwise act to lessen and  
24 reduce the injuries, damages and disabilities

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1     alleged in the Complaint.

2             Q.       What is your understanding of what  
3     this means?

4             A.       Can you interpret that for me?

5     I --

6                     MR. LESSER:   Yeah, I'm going to  
7     object to the form of that.

8     BY MS. NAPPI:

9             Q.       Do you understand what this  
10    defense means?

11            A.       I don't.   That -- you mean that  
12    particular statement in 125?   The plaintiff -- so  
13    that would be Rachel -- failed to mitigate,  
14    diminish or otherwise act to lessen or reduce the  
15    injuries, damages -- I don't know if it's the  
16    legal terminology, but I -- I can't say I can  
17    make a safe interpretation of that.

18            Q.       And that's okay, I just was asking  
19    if you understood what it meant.   Did you see in  
20    this document that SGT has asserted a crossclaim  
21    against Camp Cherith?

22            A.       Could you repeat the question?  
23    I'm sorry.

24            Q.       Sure.   Did you see that SGT has

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1 asserted a crossclaim against Camp Cherith?

2 A. I know our attorneys are dealing  
3 with that. I guess I'd need to read that again,  
4 the document that was brought before me. What  
5 section of the document is it?

6 Q. We're just going to scroll down a  
7 little bit, and I don't need you to read  
8 everything verbatim. I'm not going to ask you  
9 anything that requires you to read anything. It  
10 starts right here.

11 A. Okay. Number 133?

12 Q. Yes, sir.

13 A. Okay. Hold on. To be honest with  
14 you, I'm assuming that our attorneys will be  
15 dealing with that.

16 Q. Okay. So all I want to know is if  
17 you have an understanding of what a crossclaim  
18 means?

19 A. I would need an explanation.

20 Q. Okay. And that's fine.

21 A. I would have to dialogue with my  
22 attorney on that. I'm sorry.

23 Q. No, no, no, that's okay. That's  
24 the answer to the question. We can take this

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1 exhibit down. Thank you. Okay. So I want to  
2 back up a little bit to talk about SGT's  
3 structure. Okay?

4 A. Okay.

5 Q. And so bear with me, because I'm  
6 going to just try to understand this. So you  
7 testified earlier that there was a board of  
8 elders, and then a combined board. Did I get  
9 that right?

10 A. We have seven boards at the  
11 church.

12 Q. I think it will be easier if we go  
13 this way, and I apologize, can you just name the  
14 seven boards for me?

15 A. Sure. I understand. We have a  
16 school board, we have a missions board, their --  
17 you know what their jurisdiction is basically by  
18 their title, over the school, over missions.

19 Q. Yep.

20 A. And then, we have a deaconess  
21 board, a deacon board, an elder board, a trustee  
22 board, and a combined board.

23 Q. Okay.

24 A. I never get bored at our church.

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1 Q. Okay. And all of these boards  
2 report to the senior pastor?

3 A. Yes.

4 Q. Okay. And I just want to make  
5 sure my assumption, based on the title, is  
6 correct. Okay? The combined board, what is that  
7 made up of?

8 A. The combined board is actually the  
9 main ruling entity of our congregation. We are a  
10 membership driven church. The membership elects  
11 those who will serve on the combined board, and I  
12 myself am under the accountability of the  
13 combined board. The combined board is made up of  
14 elders, deacons and trustees.

15 Q. And when you say --

16 A. Okay. Nine trustees, nine deacons  
17 and seven elders.

18 Q. Okay. Thank you. And so when you  
19 say you, yourself, you mean the senior pastor is  
20 responsible to the combined board, correct?

21 A. I'm sorry, yes. Define it as the  
22 structure, the senior is accountable to the  
23 combined board, even though the senior pastor is  
24 the chairman of the combined board.

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1 Q. Understood. That's so helpful.

2 Thank you.

3 MR. ARGENTO: I'm sorry, I just  
4 want to get clarification. I only had --  
5 I believe, Pastor Zarlengo, you said  
6 there were seven boards. I only have  
7 six: The school; missions; deacons;  
8 elder; trustee and combined. Was there  
9 another one I missed?

10 MR. LESSER: Deaconess.

11 THE WITNESS: Oh, the deaconesses.  
12 That's about 15 women in our congregation  
13 that are in leadership.

14 MR. ARGENTO: Okay. I thought you  
15 just repeated deacons, so thank you for  
16 clarifying.

17 BY MS. NAPPI:

18 Q. Okay. This is the board structure  
19 of SGT presently, correct?

20 A. That's correct.

21 Q. And to your knowledge in 1991, was  
22 this the structure of SGT?

23 A. Yes.

24 Q. And to your knowledge, was this

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1 the structure of SGT in approximately 1985?

2 A. Yes. Most definitely.

3 Q. Okay. Thank you. Now, you  
4 testified that there was a school board. Can you  
5 define what the school board is?

6 A. The school board exercises their  
7 authority over the administrative -- the  
8 administrators and the faculty of the school.  
9 They also have jurisdiction and auspices over the  
10 finances, but that is submitted to the combined  
11 board.

12 Q. Okay. And by school you mean the  
13 Smithtown Christian School, correct?

14 A. Yes, Smithtown Christian School.

15 Q. And is there any other school that  
16 is under the purview of this board?

17 A. No.

18 Q. And was that true in 1985?

19 A. Yes.

20 Q. And was that true in 1991?

21 A. Yes.

22 Q. Okay. Thank you. Now, as the  
23 senior pastor, you are the overseer of all of the  
24 other pastors associated with SGT, correct?

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1 A. That is correct.

2 Q. Okay. And do you know in -- and  
3 you may not know the answer to this -- in 1990,  
4 how many pastors were at SGT in total?

5 A. Prior to me coming on, I know  
6 there was Pastor Ron with the youth, Pastor Ted  
7 with the circles of concern, it was a small  
8 group, small groups, Pastor -- Pastor Dr. Greco  
9 was over the school, but he was still viewed as  
10 part of the pastoral staff, because the school is  
11 a ministry of the church. Pastor Forseth is the  
12 senior pastor, and I may be missing someone,  
13 forgive me. I think it was five, five or six.

14 Q. Okay. And how many pastors are  
15 there with -- strike that. I'm sorry. I'm  
16 trying to figure out how to phrase this.

17 How many pastors are there in  
18 relation to the amount of ministries at SGT right  
19 now?

20 A. Well, we try to, in a statistics,  
21 indicate that if you have about 200 individuals,  
22 you should have a shepherd or pastor over them,  
23 and the FCA that I'm part of, Fellowship of  
24 Christian Assemblies, which is not a denomination

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1 but a fellowship, we try to adhere to that same  
2 ratio, so one pastor overseeing two to 300 of our  
3 congregates, and we have about 3200, 3400;  
4 however, after COVID, across the demographics  
5 across the United States, every church has  
6 dropped by a third to a half. We've experienced  
7 the same. We're probably at about 2,000 now.

8 Q. Okay. And do you know in 1985,  
9 how many pastors there were in relation to the  
10 amount of ministries that the church housed or  
11 supported?

12 A. Again, there may be a little  
13 conjecture here, but I think it's safe to say  
14 there were about five pastors, five or six, and  
15 there were maybe about a thousand in the church  
16 at the time, and probably about 40 or 50  
17 ministries. So I'm not good at math, like you  
18 mentioned about yourself earlier, so I'm not sure  
19 how that...

20 Q. That's okay. You answered my  
21 question. I don't need to figure out the  
22 statistics. My brain would explode. So I just  
23 want to talk a little bit about the ministries,  
24 okay?

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1 A. Okay.

2 Q. How are ministries generally  
3 developed at SGT?

4 A. Well, it's birthed through vision  
5 that we believe is a felt need, maybe it's  
6 someone struggling with some type of alcoholic  
7 addiction, or there's a marital -- there's  
8 marital challenges, and so we would establish a  
9 ministry, it would be governed by the presence of  
10 a pulsating need within, you know, a smaller  
11 group, and so we would start a ministry on the  
12 basis of that. We're going to -- people need to  
13 be connected in fellowships, so we started the  
14 ministry of small groups. Marriages need to be  
15 strengthened and, you know, empowered to be, you  
16 know, strong, and so we started an entire  
17 marriage ministry, and it just goes on and on and  
18 on, youth ministry, children's ministry, a  
19 ministry to the hungry, to the poor, very need --  
20 the basis of a need, and a vision associated with  
21 it, we birth the ministry, we get a leader placed  
22 over that ministry that has the same passion,  
23 heartbeat, skill set, talents and abilities that  
24 would address that, and then there would be

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1 pastoral oversight, elder oversight.

2 Q. Okay. So I want to make sure I'm  
3 understanding. Is it fair to say then when a  
4 need is identified on an issue, the church will  
5 create a ministry to address that need?

6 MR. LESSER: Objection to form.

7 MS. NAPPI: If you understand --

8 MR. LESSER: You're paraphrasing  
9 and characterizing his testimony. I'm  
10 going to object to the form of that. He  
11 testified to what he testified to,  
12 Hillary.

13 MS. NAPPI: Okay. I'm trying to  
14 understand his testimony. I'm not trying  
15 to mischaracterize it, so --

16 MR. LESSER: I know, but he  
17 testified to it, so --

18 MS. NAPPI: Okay. So let me ask  
19 another question. I'm not going to fight  
20 with you.

21 BY MS. NAPPI:

22 Q. Is it your testimony that when a  
23 need is identified, if there is a vision for  
24 guidance on that need, a ministry could be

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1 created?

2 MR. LESSER: Same objection. You  
3 can answer over objection, if you  
4 understand the question.

5 THE WITNESS: I think I understand  
6 what you're saying, Hillary. I -- every  
7 need doesn't constitute a call, but if  
8 there's a need present, again, let's say  
9 there's a need for marriages to get  
10 strengthened, and if we as a leadership  
11 body have a vision to say we want to  
12 address that need -- obviously, there's a  
13 plethora of needs, we can't administer to  
14 them all, but if we think we can do this  
15 one, then we will address that by putting  
16 personnel and a ministry in place to  
17 address that need.

18 BY MS. NAPPI:

19 Q. Thank you. So when a ministry is  
20 created, who is the overseer of that ministry on  
21 behalf of the church?

22 A. Well, it's contingent on the  
23 ministry itself. Sometimes if it's a very, very  
24 small ministry, we would place a lay leader under

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1 the jurisdiction of an elder, and the elder would  
2 always work in tandem with the pastor that would  
3 be, you know, covering in that area. You know,  
4 again, we try to maintain a high level of  
5 accountability and oversight. I'm following the  
6 precedent that was established by Pastor Forseth,  
7 and I try to do the same.

8 Q. Okay. In 1990, do you have any  
9 knowledge about how many ministries were specific  
10 to the needs of children?

11 A. I don't.

12 Q. Okay. And so all of the pastoral  
13 positions at SGT are compensated positions,  
14 correct?

15 A. That is correct.

16 Q. Okay. And just so I'm clear,  
17 Mr. Braaten was an employee of SGT, correct?

18 A. Yes, that's correct. Can I --  
19 there was a question you asked about children's  
20 ministry?

21 Q. Yes, sir.

22 A. They had a pastor, Pastor David  
23 Harf (sp) that was over the children's ministry.  
24 You know, when you say 1990, that's before I came

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1 on. I came on in 1991. But when I came on in  
2 1991, a Pastor David Harf was the children's  
3 pastor. It was a gradual evolution into the  
4 role, from what I understood, from Pastor Forseth  
5 as the senior pastor, Pastor David Harf was  
6 working with the children, and then he said you  
7 know what, I'm going to bring you on as a  
8 full-time pastor.

9 Q. And do you have knowledge as to  
10 whether Mr. Harf worked with Mr. Braaten?

11 A. Oh, I believe there was overlap in  
12 their ministries. It would be ministering to the  
13 children, and to the youth, and they would have  
14 various events.

15 Q. And I'm focusing now with this  
16 question specifically in the timeframe from 1985  
17 to 2004. Okay?

18 A. Okay.

19 Q. To your knowledge, was there any  
20 ministries that were specifically pointed to  
21 address the issue of sexual abuse and children?

22 A. To the best of my knowledge, a  
23 specific ministry dealing with that, no.

24 Q. Thank you. So I just want to

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1 focus a little bit on the Smithtown Christian  
2 School. That is -- strike that. I'm sorry.

3 Is the Smithtown Christian School  
4 owned and operated by SGT?

5 A. Yes. It's under the -- it's  
6 classified as a ministry of Smithtown Gospel  
7 Tabernacle. The school is a separate -- it's a  
8 distinct entity, not separate from SGT.

9 Q. Okay. And do you know what year  
10 the Smithtown Christian School began operating?

11 A. It was under the leadership of  
12 Dr. Sal Greco, and Pastor Forseth and he had come  
13 together and agreed that this ministry should be  
14 launched. What year? It may have been in the  
15 1970s.

16 Q. Okay. And if you can, do you know  
17 what the oversight relationship is between SGT  
18 and the Smithtown Christian School, if any?

19 A. Yeah. Well, the school board was  
20 subject to and submitted to the combined board,  
21 and Pastor Forseth had Pastor slash Dr. Sel  
22 Greco, who was the superintendent of the school,  
23 he was on his pastoral staff, and so Pastor  
24 Forseth and Pastor Dr. Greco was -- he was

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1 accountable to Pastor Forseth, being on his  
2 pastoral staff.

3 Q. And to your knowledge, was this  
4 true in 1990?

5 A. Yes.

6 Q. And to your knowledge, was this  
7 relationship the same in 1995?

8 A. Yes.

9 Q. And is it true today?

10 A. A different superintendent, I did  
11 the funeral for Pastor Sal Greco, but now we have  
12 a -- our superintendent is Joel Maus. It's  
13 M-A-U-S.

14 Q. Thank you. Do you have any  
15 ministries -- strike that.

16 Does SGT have any ministries that  
17 are specifically designed to benefit survivors of  
18 sexual assault?

19 A. We have a counseling ministry  
20 that's done by Dr. Ted -- by Pastor Ted Bichsel.  
21 Pastor Ted Bichsel runs our entire counseling  
22 ministry, and there are many situations that  
23 would reflect individuals who had walked through  
24 sexual abuse, and Pastor Ted would be able to

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1 minister and help.

2 Q. Okay. And when was this  
3 counseling ministry created; if you know?

4 A. Yes, it would've -- the inception  
5 would've been in 2000, because I reassigned  
6 Pastor Ted Bichsel to that position. When I  
7 assumed the role as senior pastor in 2000, I  
8 asked if he would move from being over the small  
9 groups, to establishing a ministry that would  
10 deal with counseling those who are hurting and --  
11 and he did so. He also established a marriage  
12 ministry, and a men's ministry, and the ministry  
13 to the senior saints in our coronation. I put a  
14 lot on his shoulders, but he's been with the  
15 church -- I would be the longer serving pastor at  
16 31 years, but he is truly the longest serving  
17 pastor at 39 years.

18 Q. Sounds like Pastor Bichsel is a  
19 pretty busy man. Prior to 2000, are you aware if  
20 the church had a similar type of ministry?

21 A. Prior to 2000, Pastor Forseth had  
22 the same demeanor and disposition, core value  
23 conviction as I have, and if there was a need, if  
24 there was someone hurting, if there was someone

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1 broken, there would be an arm extended. It may  
2 have not been a formal titled position, like I  
3 gave to Pastor Bichsel, but the pastoral staff  
4 was always ready to minister to any need. If it  
5 was, you know, a counseling situation for someone  
6 who had walked through child abuse, they were  
7 there ready to help, to assist, to minister to  
8 them.

9 Q. Can you describe how the pastoral  
10 staff would be made aware of a need?

11 A. Oh, when you have a congregation,  
12 and everyone is sharing about their successes and  
13 failures, their pain, their brokenness, that's  
14 always -- gets up to the ear of the pastors and  
15 elders, and then we take opportunity to reach out  
16 and minister to the individual.

17 Q. How many total board members does  
18 SGT have?

19 A. Well, if I could go through each  
20 one, we have seven elders, we have nine deacons,  
21 and then we have what's called non-CB deacons,  
22 where they don't have to serve on the combined  
23 board making judgments through the process of  
24 votes, but they're there for the power of

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1 influence, not necessarily the power of making a  
2 judgment, so we would have about 20 deacons, but  
3 on the board itself -- no, on the deacon board  
4 there are 20 deacons, and of those 20 deacons,  
5 nine of them are called combined board deacons --  
6 don't you love all the logistics, and the  
7 structure, and the governance, and the polity of  
8 our church? Then, you have -- then we have about  
9 15 deaconesses, we have about 12 that serve on  
10 our missions board, and we have, I believe, nine  
11 that serve on our school board. The combined  
12 board, remember, incorporates our elders, deacons  
13 and trustees, and that amounts to 27.

14 Q. Okay. And had these numbers  
15 expanded as the church grew, or were they  
16 substantially similar in the '90s?

17 A. In the SGT constitution that goes,  
18 you know, all the way back I think into the '70s,  
19 that was the structure, the polity that was to be  
20 in place, nine trustee, nine deacons, seven  
21 elders -- it could increase to nine, and  
22 sometimes when that happens that's when the  
23 combined board would mushroom up to 27, sometimes  
24 it was 25, based on the number of elders, but,

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1 no, that polity structure was operating during  
2 the 23 years of Pastor Forseth, the 22 years for  
3 me as senior pastor. And prior to that for 15  
4 years that would be Pastor Morris Anderson. I  
5 believe that that was in play, it just may have  
6 not -- we didn't have a formal missions board at  
7 the time, or a school board, but they did have an  
8 elder board, deacon board, deaconess board, and  
9 trustee board.

10 Q. Okay. And you just mentioned the  
11 SGT constitution?

12 A. Yes.

13 Q. Do you know how often that  
14 constitution has been updated, if at all, since  
15 its creation?

16 A. I think it's been updated two or  
17 three times, and that occurred in my 22 years as  
18 senior pastor. I felt we needed to refine some  
19 areas, bring it a little bit more up to date. I  
20 wish I could tell you, Hillary, exactly when the  
21 constitution was formed, I think it was in the  
22 1970s, and so I had to bring it up to speed a  
23 little bit with some of the terminology. We used  
24 to call the deacons auxillary deacons, and so

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1 then we changed it to CB deacons. It was -- you  
2 know, it wasn't major -- it was never changes in  
3 doctrine, theology, our conduct practice, only  
4 changes in structure.

5 Q. Understood. Okay. So SGT is a  
6 Christian church, correct?

7 A. Yes.

8 Q. So I'm Catholic, and I only know  
9 what I know, so Catholic priests are prevented  
10 from having sexual encounters, right, as part of  
11 their vow to God?

12 A. Yes.

13 Q. Is there anything similar that  
14 pastors in SGT are required to abstain from?

15 A. Having been Roman -- I was reared  
16 Roman Catholic, I was the head alter boy, and  
17 my -- one of my dearest friends in the area is  
18 Monsignor Waldon, so we try to look at the areas  
19 where we bridge and come together in similarity  
20 as Christians and Catholics. When it comes to  
21 our clergy, they don't have to take the vow of  
22 chastity, obedience or poverty, which a catholic  
23 priest needs to. We just ask them to adhere to  
24 everything that the Bible exhorts them to be and

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1 to do in character, in conduct, in attitude, in  
2 disposition, in speech, and, you know, no one is  
3 perfect, but we ask for God's help to maintain a  
4 very, very high standard.

5 Q. What grades does the Smithtown  
6 Christian School provide education for?

7 A. K through 12.

8 Q. And are there health classes that  
9 are given to the students in grades K through 12?

10 A. When you say health classes,  
11 pertaining to?

12 Q. Physical health?

13 A. Physical health? Well, they  
14 have -- if there's an actual class on physical  
15 hygiene, I don't think so, but they do have a  
16 physical ed program, sports programs.

17 Q. So in public schools there's often  
18 education that's colloquially referred to as,  
19 quote/unquote, sex education. Is there anything  
20 similar to that, that is given to children that  
21 attend the Smithtown Christian School?

22 A. Well, we're very cautious on  
23 superimposing, you know, our beliefs on a parent;  
24 however, any parent that has their child come to

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1 our school know that they're in an environment, a  
2 milieu of Christian doctrine, so we -- you know,  
3 our teachers will instruct the students, and all  
4 of that will reflect our biblical doctrine  
5 regarding sexuality.

6 Q. Okay. And to your knowledge, was  
7 that the same general principle about sex  
8 education at the Smithtown Christian School from  
9 the period of 1990, to the period of 2000?

10 MR. LESSER: Objection to form.  
11 Do you understand the question? I'm  
12 objecting to your -- what you call sex  
13 education. That's my objection to the  
14 form, Hillary.

15 MS. NAPPI: Okay. I'm basing it  
16 on what he just defined as the  
17 curriculum, so --

18 MR. LESSER: Again, and I don't  
19 know what you're using --

20 MS. NAPPI: I can rephrase.

21 MR. LESSER: I'm objecting to the  
22 form of that.

23 MS. NAPPI: I can rephrase it.

24 BY MS. NAPPI:

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1 Q. So you just testified that  
2 children that are at the Smithtown Christian  
3 School receive biblical education with regard to  
4 sex, okay? Is that correct?

5 MR. LESSER: Objection to form.  
6 Mischaracterizes the testimony.

7 MS. NAPPI: I mean, he just  
8 testified about it, so I'm just trying to  
9 define --

10 MR. LESSER: No, I don't -- again,  
11 I objected to form, what you call sex  
12 education. He testified as to what he  
13 testified to. You're now characterizing  
14 something, and I object to that  
15 characterization.

16 MS. NAPPI: No problem. Kim,  
17 could you just read back the last answer  
18 that Pastor Zarlengo gave before we got  
19 into this objection dialogue?

20 (At this time, the court reporter  
21 read back from the record as was  
22 requested.)

23 BY MS. NAPPI:

24 Q. Moving on. To your knowledge, the

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1 Christian doctrine that reflects the biblical  
2 doctrine that is taught to children at the  
3 Smithtown Christian School, was that the same in  
4 the period of 1990, the period of 2000 --

5 A. Yes.

6 Q. -- a -- okay. That's all I wanted  
7 to know.

8 A. We never had, in the school, a  
9 formal class on sex education; however, every  
10 teacher and every student would be exposed to  
11 what the Bible has to say about sexuality, about  
12 the interrelationship between a man and a woman,  
13 the sanctity of marriage, that there would not be  
14 premarital sex, and that -- that was understood  
15 in any conversation, any didactic setting from  
16 the teacher in relationship to the student, and  
17 every parent was cognizant of that, but there was  
18 no formal we're having a class on sexual  
19 education. We did not have that, and don't have  
20 that at the school.

21 Q. Understood. The biblical doctrine  
22 that we're talking about that was being taught at  
23 the Smithtown Christian School, did that carry  
24 over, to your knowledge, to the ministries that

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1 SGT provided that were targeted toward children?

2 A. Let me just -- I just want to make  
3 sure, when you say being taught, it wasn't in a  
4 formal curriculum, it's more taught through  
5 maturation and through discipleship, and through  
6 mentoring and through conversations, so though  
7 it's not formal, it's very effective and very  
8 impactful, so when you say was that present in  
9 the ministries at our church, yes, in the same  
10 exact way. We would engage in a dialogue or a  
11 conversation, as we reflect on biblical passages  
12 that pertain to one's sexuality and moral and  
13 ethical purity.

14 Q. And do you know in 1985  
15 approximately how many children attended the  
16 children's ministries that SGT offered?

17 A. I -- to be honest with you, I  
18 don't. I could conjecture maybe 30 or 50. I  
19 don't know.

20 Q. Okay. And that approximation is  
21 fine, and we understand that it's an  
22 approximation. Do you know the number of  
23 children who attended or took advantage of the  
24 SGT children's ministries in 1995?

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1           A.       In 1995? In the children's  
2 ministry, I would say probably about 100. That's  
3 children we're talking about, right, not workers?

4           Q.       No, sir. Just children. And the  
5 same question, but for 2000, sir.

6           A.       In 2000, it would've probably  
7 mushroomed up to about 150 to 175, and then it  
8 continued to grow to about three to 400, and then  
9 COVID hit and parents were very concerned about  
10 their children coming to any event, so it  
11 plummeted. I think we're back now to about 150.

12          Q.       Okay. So in 1985, are you aware  
13 if there was any mechanism where a child that was  
14 either at the Smithtown Christian School, or  
15 using one of SGT's children's ministries would be  
16 able to report sexual assault or abuse?

17          A.       I would say the mechanism would be  
18 the stellar relationship that every leader had  
19 with one another, and with the parents, and with  
20 the children. There was open communication.  
21 Again, the environment here is we're going to  
22 walk in truth, we want light, and we want it to  
23 be bright, and if anyone in any way felt that  
24 there was any level of concern, if there was any

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1 potential of actual abuse, it would have  
2 immediately come to the attention of the  
3 leadership.

4 Q. And I appreciate that answer. I  
5 just am trying to figure out if there was any  
6 sort of formal way for someone to have reported  
7 that type of behavior in 1985.

8 A. If you want to say formal, as far  
9 as an announcement specifically being made, I  
10 would say through every sermon, every message,  
11 every leader would be communicating our high  
12 standard, and that would translate into an avenue  
13 of response if somebody was being abused, if  
14 someone was being mistreated in any way,  
15 physically, sexually, verbally. They always knew  
16 they had an avenue of communication. There was  
17 no separation of clergy and laity, or leadership  
18 and the people, not at all. I don't want to say  
19 we pride ourselves, but we are a -- we say here,  
20 one of our mottos, we're a family, a team, and an  
21 army, and as a family we're going to communicate  
22 clearly with one another anything that's  
23 unfolding in the context of relationships and  
24 leadership, and there's many, many eyes, even

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1     though our leadership structure is cumbersome, I  
2     like a multitude of leaders. That's many eyes, a  
3     lot of objectivity, and a lot of avenues by which  
4     something can be communicated.

5             Q.       Okay. And so would that be the  
6     same environment that you believe was present in  
7     1990?

8             A.       Yeah, because I inherited that  
9     from Pastor Forseth, and I just tried to continue  
10    to maintain that exact culture among our people.

11            Q.       And so you testified that you  
12    instituted CAPSS in 2005. Did CAPSS in 2005  
13    forward, change the way that a child could report  
14    sexual abuse either within SGT, or at the  
15    Smithtown Christian School?

16            A.       I don't believe it -- it only  
17    added to what was already present, as far as a  
18    vehicle of communication among our leaders,  
19    congregants and parents. Our elder board just  
20    felt like, you know what, this is who we are, we  
21    are open, we are transparent, we are pursuers of  
22    truth, we want a safe environment for our  
23    children and our youth, so let's intensify it,  
24    let's, you know, codify it and get it into more

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1 of a written form, and a formal opportunity for  
2 our leaderships to be better trained -- for our  
3 leaders to be better trained, and so that's why  
4 in 2005 we began to implement a program called  
5 CAPSS. Prior to that though, I would say there  
6 was access, immediate access from any parent,  
7 child, to the leader, and that would get to the  
8 pastoral staff.

9 Q. Prior to CAPSS, was there a formal  
10 messaging put out to children that participated  
11 in any of the children's programs associated with  
12 SGT about reported sexual assault?

13 A. I would say that we would use the  
14 language, parents, listen, we are here to guard  
15 and protect your children as we mentor them and  
16 disciple them. As we work with your children, if  
17 there's anything that would ever surface, or if  
18 there's any child here that feels something has  
19 happened that would be disturbing, we want an  
20 open communication right with us. Again, we  
21 always emphasized, Hillary, that we wanted  
22 absolute open communication with the leaders, and  
23 the parents, and the children, and the youth, and  
24 even the young adults, because we --

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1 Q. And I --

2 A. -- to the young adults.

3 Q. Okay. And I appreciate that  
4 response. I'm just trying to focus on the  
5 messaging that was actually given to the youth,  
6 so was there any formal messaging given directly  
7 to the youth that you're aware of about reporting  
8 sexual assault prior to 2005?

9 MR. LESSER: Objection. In  
10 addition to what he testified?

11 MS. NAPPI: Yes.

12 MR. LESSER: You can answer.

13 THE WITNESS: So if you can help  
14 me, when you say formal, it's a term we  
15 continue to use, I know we all have a  
16 denotation, connotation, the meaning is  
17 in the person more than the word. What  
18 do you mean by formal?

19 BY MS. NAPPI:

20 Q. All right. So I'm going to give  
21 an example, and if there's something similar or  
22 not similar, just tell me if you don't  
23 understand. For instance, in the context of the  
24 Smithtown Christian School, right, were there any

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1 assemblies that were given to the children about  
2 reporting being sexually assaulted or abused?

3 A. And that would be prior to 1990?

4 Q. Prior to 2005, sir.

5 A. Prior to 2005, I could only  
6 conjecture, you know, they would assemble with  
7 the -- the students would assemble with the  
8 chaplain, and the superintendent, and the faculty  
9 every week two or three times to worship, to  
10 pray, and to hear announcements, so I think I  
11 would be unfair to say that something like that  
12 was not communicated.

13 Q. Okay. Was it --

14 A. I'm not omniscient. I wasn't  
15 present. We're talking about hundreds and  
16 hundreds and hundreds of meetings --

17 Q. And all I'm asking --

18 MR. LESSER: Let him finish,  
19 please.

20 MS. NAPPI: No, no, I'm --

21 MR. LESSER: But you're  
22 interrupting him. Let him finish,  
23 please.

24 BY MS. NAPPI:

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1 Q. Okay. Are you done, sir? Because  
2 all I'm trying to determine is what you know, so  
3 if you don't know, I don't want you to guess, and  
4 that's all I'm --

5 MR. LESSER: But he was  
6 testifying, and you interrupted him. So  
7 you were saying hundreds and hundreds and  
8 hundreds of assemblies?

9 THE WITNESS: Right. They would  
10 have hundreds and hundreds and hundreds  
11 of assemblies, opportunities for the  
12 superintendent, the faculty, the  
13 chaplain, a pastor would come in to speak  
14 to the group to be able to communicate  
15 with them, and I -- I know our standard,  
16 and I could -- I could speculate and  
17 conjecture that that type of information  
18 was made available to the children and to  
19 the parents.

20 BY MS. NAPPI:

21 Q. Okay. And do you know if that  
22 message and information was also made available  
23 to the children who participated in the  
24 children's ministries?

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1           A.       That too was, you know, weekly  
2 meetings, consistently meeting with the  
3 children's pastor, the youth pastor, senior  
4 pastor would step in, associate pastors would  
5 step in, elders would step in speaking with the  
6 group, and we were always -- you know, those are  
7 always very important topics to us to talk about,  
8 you know, open communication, being truthful, if  
9 you're hurting -- see, we have an environment  
10 here at the church, we say if you're hurting, or  
11 something ever happened to you, we want to know  
12 about it. We want to be there to extend our  
13 love, our help, and our hand.

14           Q.       Were any of the people who  
15 ministered to children in the 1980s specifically  
16 trained to recognize the signs of childhood  
17 sexual abuse?

18           A.       Specifically trained?

19           Q.       Yes, sir.

20           A.       To the best of my knowledge, I  
21 don't believe so, but then again I wasn't here,  
22 Pastor Forseth could have had a seminar on a  
23 weekend, and so I would not be, you know, serving  
24 an answer here well if I was not cognizant of

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1 that. He could've had a seminar and said I want  
2 to meet with everyone and talk about the  
3 importance of this area.

4 Q. From 1991 to 2005, did you have  
5 any specific training of any leader that was  
6 involved with the youth ministries about  
7 recognizing the signs of childhood sexual abuse?

8 A. Well, one of the things that we  
9 did that was very important, is that we had an  
10 application form that they had to fill out, we  
11 did a background check, and we communicated to  
12 the leaders we need you to have your eyes and  
13 ears and mind and heart open, and to be ready if  
14 anything of that nature ever came to your  
15 attention, to address it by bringing it to the  
16 attention of the elder board, and the pastoral  
17 staff, who would then in turn, based on the  
18 nature of it, and the depth of it, and the  
19 intensity of it, would be brought before the  
20 combined board.

21 Q. Okay. And so other than that,  
22 were any of these individuals sent to a class  
23 about recognizing the signs of childhood sexual  
24 abuse?

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1           A.       No formal class was offered,  
2 except the class of a good student of the Bible.

3           Q.       Okay.

4           A.       And a good student of the Bible is  
5 going to know exactly how they need to address  
6 it, and that's why we appreciated and applauded a  
7 formal program that CAPSS provided for us, and  
8 when we looked at it and read it, we realized  
9 we've already been doing that.

10          Q.       Okay. And from 1991 to 2005,  
11 other than what you just testified to, were there  
12 any formal written materials given to the adults  
13 that were ministering children about the signs of  
14 childhood sexual abuse?

15          A.       No, there was nothing in written  
16 form that was handed out to any of our  
17 leadership, except, and may I esteem, the Bible  
18 is probably better than any written document  
19 anyone would ever receive, and if someone is not  
20 a student of the Bible, then they just think  
21 it's, you know, nebulous and ambiguous, and just  
22 says God loves you and that's it. Oh, my  
23 goodness, that's a clear indication someone  
24 hasn't read the Bible. So when someone reads the

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1 Bible, they'll realize -- and that's all we would  
2 teach -- when they read that, they would know  
3 exactly what they need to do, and need to look  
4 for, because we talk about the flesh, the sinful  
5 nature, and you know what to look for, and if you  
6 see that, you bring that forward.

7 Q. Do you know what the symptoms  
8 or -- strike that.

9 Do you know the signs of a child  
10 who has been sexually abused?

11 A. Only because of my training that  
12 came through the Bible, and through the CAPSS  
13 program, and, you know, certain -- I mean, things  
14 that you would observe, and you would see in  
15 their behavior, when they would become quiet and  
16 depressed, and, you know, complain of physical  
17 issues within their body, and become very  
18 isolated, alienated, separated and unwilling to  
19 converse, you know, a lot of those things, and  
20 any time our children's pastor or any minister  
21 would see that kind of behavior, we're a very  
22 congenial, upfront congregation, if anyone was  
23 observing something like that, they would zero in  
24 on that, and begin to ask questions and inquire.

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1 Q. Okay. I'm going to strike the  
2 last part of that response, about people  
3 inquiring and looking. That wasn't my question.

4 My question to you is what part of  
5 the Bible identifies the behaviors and signs of  
6 childhood sexual abuse that you just described?

7 A. Well, I would reference the first  
8 Thessalonians chapter four, Matthew chapter five,  
9 first Corinthians chapter six, Romans chapter  
10 one, all of these are passages in the Bible that  
11 speak about sexual behavior, and it's applicable  
12 not just to adults, but to children and youth.

13 Q. Okay. Thank you. If a  
14 parishioner complains that a pastor was acting  
15 lustful towards her, would SGT be required to  
16 investigate that allegation?

17 A. Absolutely and immediately. Case  
18 in point, and I think if you read my interview,  
19 that's exactly what happened with Ron Braaten  
20 when after leaving the church, no longer under  
21 our jurisdiction or supervision -- again, after  
22 leaving the church, no longer under our  
23 jurisdiction or supervision, he was a supported,  
24 not a sent missionary -- and that's not just a

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1 conceptual distinction for us here at the church,  
2 a sent missionary versus a supported. A  
3 supported means we just send them money, that's  
4 it. If they're sent, then they're accountable to  
5 us. Ron was not a sent missionary. He was a  
6 supported missionary.

7           When he was there in Belize, a  
8 couple that they were working with, she had  
9 indicated that Ron had looked at her lustfully.  
10 We immediately zeroed in on that, just on that  
11 alone. We called for a meeting with me as the  
12 missions pastor, that's what I was doing at the  
13 time, Pastor Forseth, the senior pastor, the  
14 chairman of the missions board, her pastor here  
15 in the states in New City, New York, they -- and  
16 we required both Ron and her, with their spouses,  
17 to return to New York for an investigation and  
18 analysis and assessment of this accusation that  
19 she had made against Ron that he had looked at  
20 her lustfully. Nothing was done physically,  
21 nothing at all. And so we had that meeting with  
22 her pastor, her associate pastor, her missions  
23 pastor, myself, so there was about eight of us,  
24 and we directly confronted him on that, and she

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1 presented that Ron had looked at her lustfully.  
2 Ron remained a little quiet. If you read in my  
3 report, I was a bit disturbed by that. I thought  
4 he would defend himself. He just remained quiet.

5 When he was directly asked by us,  
6 he said I never did anything of the such. And  
7 then, that just -- then, after the whole meeting,  
8 it was kind of like her word against his word,  
9 they were both adults, both missionaries  
10 supported by our church, and supported by their  
11 church, not sent missionaries, so we had no other  
12 accountability than the finances with them, but I  
13 told Ron, I said, Ron, you've got to watch  
14 yourself, make sure, you know, your eyes don't  
15 roam, and there should never be any lust in your  
16 heart. Jesus taught us in Matthew five it's not  
17 just the act of adultery, it's to look upon a  
18 woman with lust, to avoid that completely, so,  
19 yes, we will come down strong just on someone  
20 indicating they looked lustfully.

21 Q. Okay. So what year was this; do  
22 you recall?

23 A. I don't. I was -- I was not the  
24 senior pastor, so it wouldn't have been 2000.

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1 Ron had left in 1996, was two years in Africa,  
2 and then he went to Belize, so I'd narrow it  
3 probably down to 1998.

4 Q. Okay. And you just testified that  
5 SGT would come down hard, what do you mean by  
6 that?

7 A. Well, we would investigate  
8 immediately. We would -- if there's any  
9 accusation made against not just a pastor, but an  
10 elder, a deacon, a deaconess, a trustee, anyone  
11 in any kind of elected official position of  
12 leadership, or if they were a lay leader in  
13 certain capacity, if any accusation at all was  
14 brought to our attention, we would move on it at  
15 100 miles an hour. We would.

16 Q. So can you just describe the  
17 investigatory process that you're referring to by  
18 moving on this?

19 A. We would immediately bring in the  
20 person and have the elders and some of the  
21 pastors interview the individual; however, we  
22 would want to be very sensitive. If it was a  
23 woman, and she was uncomfortable with a group of  
24 men, then we would bring in the pastors' wives,

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1 we would bring in deaconesses, and just allow it  
2 to be a safe, you know, comfortable environment  
3 for that person to express what had happened, if  
4 anything at all had taken place.

5 And then, after that we would then  
6 confront the individual, if it was a pastor,  
7 elder, deacon -- but I thank God we haven't had  
8 that happen -- that we would confront, then, the  
9 individual, if need be, and then bring them  
10 together. Jesus gives us very clear instructions  
11 in the gospel of Saint Matthew, chapter 18, on  
12 how something like this should take place, and  
13 the steps, and we try to adhere to those biblical  
14 standards.

15 Q. Okay. So after interviewing the  
16 person making the report, what would you do next?

17 A. We would bring that to the elder  
18 board, as I mentioned, and then if we felt like  
19 someone had to be removed from ministry, the  
20 elder board had the jurisdiction and the  
21 constitutional responsibility to remove them.

22 Q. And if the -- I'm sorry, were you  
23 finished?

24 A. And sometimes the combined board

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1 would be involved in that same decision, but  
2 never the membership. Leadership would  
3 immediately deal with it.

4 Q. Okay. And if the person making  
5 the report was a child, what would be the first  
6 step?

7 A. If there was a child that -- now?  
8 Are you talking about now in 2022?

9 Q. No, I'm talking about in -- well,  
10 yeah, let's go now in 2022 first.

11 A. Yeah, based on the requirements of  
12 CAPSS, the first line of report has to go  
13 immediately to the CAPSS group, and present in  
14 that group are two pastors, two elders, two  
15 deacons, and then it's also -- it's reported to  
16 me as the senior pastor, so if there was any  
17 abuse, immediately it would be reported to me as  
18 the senior pastor, to the CAPSS committee, and  
19 then it would be reported to the elder board, and  
20 they would begin a process of investigation, and  
21 whoever the accusation came against, they are  
22 immediately disconnected from that ministry,  
23 until any question of any allegation is lifted.

24 Q. Okay. And was this process the

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1 same in 1991?

2 A. In '91, the process was quite  
3 similar, but we've gained better insight in how  
4 to do that through CAPSS in more detail.

5 Q. And in 2022 if a child reports  
6 this, when would the police be called?

7 A. The CAPSS would make that  
8 determination, the CAPSS group, based on the  
9 information that was given to them, but we would  
10 almost, I would say 99 percent of the time,  
11 immediately contact the police.

12 Q. Okay. And in 1991, when would the  
13 police have been called?

14 A. It would be the same mindset of  
15 approaching it with a high level of severity in  
16 reporting it to the police. You know, there's  
17 the -- the one contingency is sometimes in a  
18 counseling session with a pastor, but I even told  
19 my pastoral staff that your hands cannot be tied.  
20 If something of that nature was presented to you  
21 in a pastoral setting, even though there are some  
22 issues of legal clergy privilege, I want you  
23 still to bring that out, and bring it to our  
24 attention, and so my pastors -- and Pastor

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1 Forseth may have done this, I'm not sure, but my  
2 pastors, we would do that, and that would be we  
3 would tell the person before you open up with any  
4 kind of information, it's not going to tie our  
5 hands from reporting this to the police if  
6 necessary.

7 Q. And so the incident that you  
8 testified about, where a female identified that  
9 Mr. Braaten was acting lustful toward her, did  
10 that report trigger a written complaint being  
11 made?

12 A. She never wanted to write any  
13 written complaint.

14 Q. And is there any requirement that  
15 SGT has about memorializing complaints they  
16 receive about pastors?

17 A. Well, remember, he was not a  
18 pastor at the time. Are we referring to that?  
19 Are we in that context?

20 Q. No, just in general.

21 A. Okay, so not with Ron Braaten,  
22 missionary that left the church?

23 MR. LESSER: Now I'm confused by  
24 the question. I think you've got to be

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1 clear --

2 MS. NAPPI: I'm rephrasing. I'm  
3 rephrasing. No problem.

4 BY MS. NAPPI:

5 Q. If a person makes a complaint,  
6 doesn't matter what their role is, about a pastor  
7 that is working for SGT, how is that complaint  
8 memorialized?

9 A. Can you help me understand  
10 memorialized, when you --

11 Q. Is it written down in any way?

12 A. Would it be written down? Because  
13 in reflecting on my tenure over the 22 years, no  
14 accusation was ever brought against any of my  
15 pastors in the pastoral staff. With Pastor  
16 Forseth, I'm -- I know that there was no one that  
17 indicated there was sexual misconduct that was  
18 brought before his attention.

19 Q. That's not what I'm asking you.  
20 Again, let me be a little bit more specific.

21 A. All right. I apologize. I  
22 thought I --

23 Q. No, I appreciate you trying to  
24 answer the questions. I'm not trying to be

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1 adversarial. I'm just trying to specify what I'm  
2 asking you.

3 If a person had a problem with a  
4 pastor, right, does not have to be sexual  
5 misconduct, just a problem with a pastor --

6 A. Okay. A problem.

7 Q. Yes, just a complaint, right,  
8 about this person, and they wanted to report that  
9 issue, was there a mechanism by which SGT was  
10 keeping a record of these issues?

11 MR. LESSER: Objection to form. I  
12 really don't understand that question,  
13 Hilary, I'm sorry. I can't let him  
14 answer that question the way you related  
15 it. It's not only a hypothetical, but  
16 it's spoken with a lot of --

17 MS. NAPPI: I'll rephrase.

18 MR. LESSER: So I would ask, if  
19 you're going to ask a question, be very  
20 specific.

21 BY MS. NAPPI:

22 Q. If a person lodged a complaint of  
23 any kind of issue related to a pastor employed by  
24 SGT, did SGT keep a record of those complaints?

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1 MR. LESSER: Objection. Same  
2 problem. You're asking a hypothetical.  
3 Why don't you just ask a factual question  
4 first?

5 MS. NAPPI: I just asked a  
6 question. If a --

7 MR. LESSER: No, you didn't. You  
8 asked a hypothetical, if. Why don't you  
9 ask the factual question, did anyone,  
10 because you're asking a hypothetical.

11 BY MS. NAPPI:

12 Q. Okay. In 30 years of working at  
13 SGT, did any person come to you and raise any  
14 kind of complaint about a pastor at SGT?

15 A. What level of complaint? You mean  
16 I don't like the way he preaches?

17 Q. Yes.

18 A. So if they didn't like the way  
19 they preached, or they didn't agree with maybe  
20 their advice in a counseling session, that would  
21 be brought to my attention, I would bring it to  
22 the elder board's attention, and if we felt the  
23 nature of it was serious -- a complaint that a  
24 pastor's sermon is boring is one thing, versus a

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1 pastor slapped someone or whatever, that would be  
2 documented in our elder board minutes.

3 Q. Okay. And would any of this  
4 documentation ever make it to an employee's  
5 personnel file?

6 A. Most definitely.

7 Q. And were personnel files kept for  
8 all pastors at SGT?

9 A. As far as information pertaining  
10 to their conduct, behavior, et. cetera, that was  
11 simply -- I was privy to that information. We  
12 never had a formal file where I would, you know,  
13 write down about that pastor's performance. The  
14 elder would -- but if there was anything that was  
15 of any concern, that would immediately be dealt  
16 with by the elder board, and that would be  
17 documented.

18 Q. Okay. Who would define what a  
19 concern would be?

20 A. Well, you know, we always would  
21 use the filter of Holy Scripture, so we would say  
22 the highest standard is taught to us in Matthew  
23 five. Jesus elevated up pretty high, and so if  
24 somebody would express themselves with any level

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1 of anger, that would be serious to us. A lustful  
2 look is serious to us, someone might say are you  
3 kidding, because Jesus himself said -- you've  
4 heard it said do not murder, but I say to you if  
5 you get angry; someone said don't commit  
6 adultery, but I say to you don't lust after a  
7 woman with your own eyes or your heart, so we  
8 would elevate a high standard of assessment and  
9 evaluation in one's moral behavior or conduct,  
10 and if anything was said about a pastor, that  
11 they were unkind, ill-sensitive, we would address  
12 that. And, my goodness, if anything was ever,  
13 ever brought to our attention about misconduct,  
14 that would be not only me as the senior pastor,  
15 but my entire elder board and the combined board.

16 Q. Okay. And so prior to 1990, are  
17 you aware if formal personnel files were kept  
18 that would house any written complaints that were  
19 made about employees?

20 A. It would be reflected in combined  
21 board minutes or elder board minutes. There was  
22 no formal files that Pastor Forseth had where we  
23 could, you know, look in that file. Now, Pastor  
24 Ted Bichsel does that with his counseling

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1 sessions, and whoever counseled at the time would  
2 keep records of individuals that they were  
3 counseling with.

4 Q. So if Mr. Braaten received  
5 counseling, there could be a file about the  
6 counseling he received; is that correct?

7 MR. LESSER: Objection. Objection  
8 to form. Do you understand the question?

9 THE WITNESS: Can you repeat it?

10 I'm sorry, Hillary.

11 BY MS. NAPPI:

12 Q. Do you know if Mr. Braaten  
13 received counseling from any members of SGT?

14 A. No, he did not receive counseling  
15 from any members of SGT. I thought you were  
16 saying did he counsel anyone.

17 Q. No, sir.

18 A. Was he counseled by anyone at --

19 Q. Yes, sir.

20 A. No, absolutely not.

21 Q. Okay. And when you assumed the  
22 role from Pastor Forseth of senior pastor, did he  
23 give you any documents that had any sort of  
24 information about the personnel he supervised?

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1 A. No.

2 Q. Do you know if any documents that  
3 would contain that type of information exist?

4 A. No.

5 Q. Okay. Thank you. Bear with me  
6 just a second, because you've answered some  
7 questions without me asking it, so I don't want  
8 to waste your time and make you go through it  
9 again, so just bear with me. I'm sorry.

10 MR. LESSER: Okay. When you're  
11 ready for another five-minute break, that  
12 would be helpful. Do you want to do it  
13 now, while you're going through your  
14 notes?

15 MS. NAPPI: Yeah. Can we come  
16 back at 12:35?

17 MR. LESSER: Perfect. Thank you.

18 (At this time, a short break was  
19 taken.)

20 BY MS. NAPPI:

21 Q. What was Ron Braaten's official  
22 title, when he was employed with SGT?

23 A. He was brought on by Pastor  
24 Forseth, and Pastor Forseth, if I might say, he

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1 had a way of connecting with families in our  
2 church, and that's kind of how he got very close  
3 to Ron, because Ron joined our church, became a  
4 member of our church, and Pastor Forseth had a  
5 strong connection with his family, and he also  
6 had a strong connection with just his web  
7 environment, his sphere of influence, and I think  
8 after observing and seeing that he was a -- you  
9 know, had a heart and a passion for youth, and a  
10 burden to see young people grow in their  
11 relationship with God, Pastor Forseth, after his  
12 own personal connection with Ron and relationship  
13 with Ron, and knowing his family history, and  
14 seeing him in his -- in the context of the  
15 church, decided to bring him -- well, he also  
16 worked as an assistant to Pastor Mike Hickey, and  
17 Pastor Forseth had the opportunity to observe him  
18 working with Pastor Mike Hickey, that when Pastor  
19 Mike Hickey resigned, Pastor Forseth decided to  
20 bring Ron on with the formal title of youth  
21 pastor.

22 Q. Okay. Is there a title at SGT  
23 that is youth director?

24 A. No, not a youth director.

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1 MS. NAPPI: Okay. I'm going to  
2 ask the reporter to just please mark  
3 plaintiff's exhibit three for evidence,  
4 and that is the document I think it says  
5 exhibit D in the title of the PDF.

6 BY MS. NAPPI:

7 Q. Okay. So I just want to make  
8 sure, Pastor Zarlengo, that you can see this  
9 document?

10 A. Yes. I'm familiar with this  
11 document.

12 Q. Okay. Great. Do you need any  
13 more time to review it?

14 A. No, that's sufficient.

15 Q. Okay. And so what do you  
16 recognize the document, which has been marked as  
17 exhibit three, to be?

18 A. The ministry job description of  
19 the youth pastor.

20 Q. Okay. This document is not dated,  
21 so do you know when this document was created?

22 A. I believe the document was created  
23 in 2000.

24 Q. Okay. And do you know if the job

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1 description that is laid out here was the same in  
2 2000, as it was when Mr. Braaten was the youth  
3 pastor?

4 A. I don't think that Pastor Forseth  
5 created this, if I have my best recall, and I'm  
6 going back 22 years, I think it was created by  
7 me, but it was a reflection of what Pastor  
8 Forseth had within his youth pastor. I think I  
9 may have added computer proficiency. I know  
10 Pastor Forseth would not have had that in his.  
11 And we would've had the correct spelling at the  
12 top, job description. Description is not spelled  
13 correctly.

14 Q. Typo aside, and the reference to  
15 computer proficiency, is there anything else on  
16 this document that is reflective of a change you  
17 implemented, versus what was in existence at the  
18 time that Mr. Braaten was hired?

19 A. Okay. If I may have the liberty  
20 then to look through it, you might want to -- a  
21 thriving relationship with Jesus Christ, no,  
22 Pastor Forseth would've had that -- am I tracking  
23 down what you want, the comparison of myself to  
24 him?

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1 Q. Yes, sir.

2 A. Okay. As far as a job  
3 description, a specific calling to work with  
4 teenagers, absolutely, a passion to see teenagers  
5 -- yes, spiritual gifts of pastoring leadership  
6 incurred, yes, five years of youth ministry --

7 COURT REPORTER: If you could just  
8 slow down a little bit when you're  
9 reading --

10 THE WITNESS: Oh, I'm sorry. They  
11 say that when I'm preaching. You try to  
12 get a lot out in 25 minutes. Do you want  
13 me to go back to number one?

14 BY MS. NAPPI:

15 Q. Yes, sir, you don't have to read  
16 it out loud, unless you'd like to. I just want  
17 to know --

18 A. Oh, that's me processing. I'm  
19 sorry. I was doing it out loud.

20 Q. That's fine. I'm just asking you  
21 if there was anything here, other than those two  
22 things that you pointed out, that were not part  
23 of the job description, to your knowledge, when  
24 Mr. Braaten was hired?

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1           A.       I would say number five, which is  
2 five years of youth ministry experience, and  
3 number eight, computer proficiency.

4           MS. NAPPI: I'm just going to ask  
5 whoever has control to scroll down a  
6 little bit, please.

7 BY MS. NAPPI:

8           Q.       Okay. Can you, please, review the  
9 section entitled responsibilities and  
10 expectations?

11          A.       I would say that would be  
12 reflective of what -- what were the  
13 responsibilities and expectations of the youth  
14 pastor, under Pastor Forseth and definitely under  
15 myself.

16          Q.       Thank you. I'm going to ask you  
17 to scroll down further, probably to the next page  
18 of the document, and I'm going to ask you to look  
19 at the relationships and the commitment, and  
20 examine them, and if you could point out anything  
21 that you believe is different from what this  
22 detailed, to what the standard was when  
23 Mr. Braaten was hired?

24          A.       Okay. I think the only thing that

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1 would be different is the commitment of at least  
2 five full years expected. That was with me, but  
3 not Pastor Forseth.

4 Q. Okay. And to your knowledge, was  
5 this job description advertised in any way when  
6 Mr. Braaten was hired?

7 A. No, because I believe I'm the  
8 one -- as I'm reading through it, I believe I put  
9 that together, when I was pursuing the hiring of  
10 my own youth pastor, so that would've been in  
11 2000, and would've been, you know, not a time of  
12 Pastor Forseth.

13 Q. Okay. And to your knowledge, is  
14 this a complete and accurate description of the  
15 requirements that SGT had for its youth pastor at  
16 the time that Mr. Braaten was hired, other than  
17 the areas you just identified that you added  
18 later?

19 A. I wouldn't say that this could be  
20 reflective of an exhaustive requirement, because  
21 there was a lot of, you know, inter-relational  
22 and personal connection that has to occur to  
23 assess one's gifting that is more than a paper  
24 assessment. You know, it comes from -- you know,

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1 Pastor Forseth I know did that with me, I know he  
2 would have done that with Pastor Braaten, and  
3 that is to have a level of relationship, a  
4 reflection on the heart, and the vision, and the  
5 purpose, for that to be verbalized very clearly,  
6 very passionately, very strongly, and then this  
7 would be a grid of expectations that I'm sure he  
8 had, even though it wasn't formally written down  
9 like I have here in 2000.

10 Q. Okay. And other than what you  
11 just testified to, are you aware if there were  
12 any specific requirements to prior training that  
13 either Mr. Braaten would have been required to  
14 have had, or any other youth pastor that would've  
15 been considered at the time Mr. Braaten was  
16 hired?

17 A. I would say when Ron was hired,  
18 there was an assessment of his character, of his  
19 personality, of his gifts, talents and abilities,  
20 of his wealth of experience with working with  
21 the, you know, children -- youth, rather. In the  
22 FCA, the Fellowship of Christian Assemblies,  
23 there isn't so much a requirement with education.  
24 Some of my friends that are in the Methodist or

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1   Episcopalian, Presbyterian have to have a certain  
2   amount of degrees. The FCA almost looks at like  
3   the Abraham Lincoln model, you know, the  
4   accumulation of the wealth of experience is  
5   sometimes better than a degree. So when it came  
6   to Pastor Forseth assessing Ron Braaten, I would  
7   say it was more in his character, his gifts, his  
8   talents and his abilities, along with the  
9   strength of his own marriage with Linda, his  
10  wife.

11           Q.       And do you believe that there's a  
12  correlation between a pastor's marriage and  
13  ministering to children?

14           A.       I think the marriage is a  
15  reflection of one's heart, and commitment to a  
16  very sacred covenant, and that should translate  
17  in that person's commitment and covenant with the  
18  ministry he's involved in, so the link between a  
19  marriage and ministry is extremely important. It  
20  was, when I was senior pastor, extremely  
21  important to me, and I know it was extremely  
22  important to Pastor Forseth.

23                   I've told my congregation the most  
24  important sermon that I will ever preach is not

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1 something that I articulate or say, but in what  
2 you observe in my own marriage to my dear and  
3 precious wife Dianne, that's the most important  
4 message I can communicate, and with my children  
5 and my grandchildren. And I know that really  
6 just mirrored the attitude and disposition of  
7 Pastor Forseth that I considered to be a  
8 spiritual mentor in my own life.

9 Q. Do you know if Pastor Forseth used  
10 the FCA standards as guidance to how he ran SGT?

11 A. Well, when you say the FCA points  
12 of guidance, it is not a denomination, so its  
13 structure is a little loose, and so the general  
14 structure of the FCA, and how they advise each  
15 autonomous church, and how it should function, he  
16 adhered to.

17 Q. Did at any time SGT subject its  
18 youth pastor to a background check?

19 A. For me, yes. The background check  
20 for Pastor Forseth, as he would do it actually in  
21 person. He met with Ron, Linda, his family, his  
22 extended family, his circle of friends, his  
23 circle of ministry companions and associates, how  
24 he was viewed among the members, so his

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1 background check in 1985 may not have been as  
2 sophisticated as ours, where we pay, you know, to  
3 have a very extensive one taken of anyone who is  
4 brought on of our lay people or our pastors or  
5 elders or leaders.

6 Q. And what's the basis for your  
7 knowledge of what Pastor Forseth did in 1985?

8 A. My conversations with him, along  
9 with what I observed, if I could say that, in my  
10 own -- when he brought me on, Pastor Ted Bichsel,  
11 when he was brought on, which would be almost the  
12 same time when Pastor Ron Braaten was brought on,  
13 and, you know, I worked under Pastor Forseth for  
14 ten years, so a lot of dialogue about how he  
15 would process through hiring of staff, and his  
16 mentoring of me to become the future senior  
17 pastor.

18 Q. Who supervised Ron Braaten?

19 A. That would be Pastor Forseth as  
20 the senior pastor, that would be the elder board,  
21 and then as colleagues, we have a strong  
22 conviction here. We hold each other mutually  
23 accountable. Even when it comes to our behavior  
24 on the computer, the pastors have to connect with

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1 one another, and there's systems that are in  
2 place where whatever site someone goes to can  
3 also be observed and seen by other pastors. Now,  
4 Pastor Forseth in his time didn't have those  
5 sophisticated tools, but the supervision of Ron  
6 would've been Pastor Forseth, and that would've  
7 been a direct supervision, it was very relational  
8 with us, and also the elder board, which again  
9 was very, very relational. Joanne Franco (sp)  
10 and Ben Gebbia and Ken Metzler, elders at the  
11 time that Ron would've been the youth pastor,  
12 there would have been a lot of relational  
13 accountability, supervision. And then, again as  
14 colleagues, Pastor Ted worked very closely with  
15 Ron, and so did I. I mean, we entrusted our own  
16 children to his care and his ministry, along  
17 with, you know, a friendship and family  
18 get-togethers, and that is why it was a major  
19 shock to our heart when this allegation was  
20 brought forward.

21 Q. Okay. And so did Mr. Braaten have  
22 something equivalent to an annual performance  
23 review?

24 A. To the best of my knowledge, I

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1 don't know. In conversation, I'm sure, because  
2 Pastor Forseth would pull us in and say, okay,  
3 how are you doing in your area, let's talk about  
4 your life with Christ, your walk with Christ,  
5 your prayer life, your marriage, and then let's  
6 talk about your ministry and its productivity.

7 Q. Okay. Thank you. To your  
8 knowledge, did any youth pastor hired by SGT  
9 receive any education or formal training related  
10 to sexual abuse before they worked for SGT?

11 A. I don't know. I would have to  
12 speculate and conjecture on that one. I --

13 Q. I don't want you to do that. If  
14 you don't know, you don't know.

15 A. Yeah, I -- as far as if they  
16 had -- I brought on, let's see, Pastor -- youth  
17 Pastor Kevin Mahaffy, I brought on Pastor Phil  
18 Baker. I never asked them if they had any  
19 background, but I know once they were on the team  
20 that they were -- had to be educated by Holy  
21 Scripture with that, and then any training  
22 program that we implemented.

23 Q. Okay. Do you know what a mandated  
24 reporter is?

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1 A. Yes.

2 Q. What's your understanding of a  
3 mandated reporter?

4 A. That they have to report, but  
5 the -- you know, for the clergy, there's an  
6 exception.

7 Q. And you testified earlier that you  
8 read Ms. Volkel's deposition testimony to some  
9 extent. Are you aware that she testified that  
10 she attended Camp Cherith?

11 A. Yes.

12 Q. Okay. And she testified that she  
13 attended Camp Cherith, after her parents learned  
14 of the camp through SGT. Were you aware of that?

15 MR. LESSER: Objection. Misstates  
16 the testimony.

17 BY MS. NAPPI:

18 Q. Okay. Were you aware of that?

19 MR. LESSER: Please, rephrase the  
20 question. I'm not going to let him  
21 answer that question the way you posed  
22 it. I think you're mischaracterizing the  
23 testimony. There's another way you can  
24 ask the question.

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1 BY MS. NAPPI:

2 Q. Okay. Are you aware of whether  
3 SGT promoted attendance at Camp Cherith at any  
4 point?

5 A. I am not.

6 Q. Did SGT now or at any time in the  
7 '90s, have a contractual relationship with Camp  
8 Cherith?

9 A. To the best of my knowledge, no.

10 Q. And do you know if a large number  
11 of youth that were involved with SGT attended  
12 Camp Cherith?

13 A. I don't know.

14 Q. Do you have any understanding of  
15 any relationship that SGT may have with Camp  
16 Cherith?

17 A. Very little.

18 Q. And what's your understanding?

19 A. Very little. I know the name, and  
20 that -- in her report, what she had indicated  
21 occurred there.

22 Q. Okay. And other than that, do you  
23 have any other knowledge of Camp Cherith?

24 A. I don't.

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1 Q. Okay. So I'm going to focus a  
2 little bit more specifically now about Ms. Volkel  
3 and her lawsuit. Okay?

4 A. Okay.

5 Q. At what point did you first meet  
6 Rachel Volkel?

7 A. My first meeting with Rachel was  
8 when we met after the Grace report had come in,  
9 and we had met with the -- I had shared with the  
10 congregation that we had determined that her  
11 allegations, according to Grace, were credible,  
12 and Ron's were very low. After that, as you  
13 know, we -- as I described earlier, we had the  
14 opportunity to meet with her. Again, that was  
15 guided and under the governance of the counsel of  
16 Pastor Linda Lecci. I wanted to be extremely  
17 sensitive, because, you know, at first when  
18 Pastor Linda Lecci had gotten in touch with me,  
19 she had -- she had painted a picture that was a  
20 little cryptic. It was difficult for me to fully  
21 understand Rachel, because, you know, Pastor  
22 Lecci just communicated that she was fragile, and  
23 to be very, very sensitive with the information.  
24 And so I interpreted that as not being stable,

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1 and that will come up later, but that's why  
2 initially I had referenced to her as being  
3 unstable, which was something that I actually --  
4 when you say when I met with her, I apologized to  
5 her for making that conclusion. It was -- you  
6 know, it was at the moment -- well, I know you're  
7 going to ask about that, I'm sorry. I may be  
8 jumping.

9 Q. No. That's okay. Are you  
10 finished with your answer?

11 A. Do you want me to expound on that?

12 Q. You were talking, so I'm not  
13 trying to interrupt you. If you're done, I can  
14 move on.

15 A. When Ron came to the missions  
16 convention, that evening he was approached by two  
17 or three detectives, I don't remember. He came  
18 to me, he was in a panic, and he said I don't  
19 know what's happening, you know, I'm being  
20 accused, and I said, you know, Ron, a year ago I  
21 was contacted, what are you saying, and -- and he  
22 had said that he had been approached by these  
23 detectives to take a lie detector test. I told  
24 him, look, I can't tell you what to do or not to

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1 do, but I would advise you to get legal advice,  
2 legal counsel, and he said, well, can you help  
3 me, so I initiated a call to Rudy Migliore, and  
4 Rudy has passed, I did his funeral about a year  
5 ago, and I spoke to Rudy, because he would be  
6 kind of informal legal -- an attorney to help me  
7 and our congregation, and so I left a message. I  
8 said, hey, Rudy, listen, Ron Braaten is here with  
9 me, he's shocked, and he needs to know if he  
10 should take this lie detector test. You know,  
11 this unstable woman is saying things about him.

12 And it's that statement that I  
13 apologized to Rachel, because at the time I was  
14 basing it on the knowledge of my conversation  
15 with Pastor Linda Lecci, and Linda just said  
16 please, please, don't say anything, don't say  
17 anything. And I also contacted the church, when  
18 we were in that -- and I guess Rachel -- yeah,  
19 Rachel had found out about me contacting, and  
20 Linda called and said, Pastor, don't do that,  
21 don't call, you know, she is so paranoid, she's  
22 so hyper about this. I said okay, okay, okay,  
23 so, you know, that was in my head when I used  
24 what I would -- and I don't -- I don't like doing

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1 that about anyone, having a prejudice in an  
2 adjective that is used to describe someone, so  
3 when I met with her, I apologized for using that  
4 term. Wow. I know that was a long answer to  
5 your short question. When was the first time I  
6 met Rachel, it was after the Grace investigation.

7 Q. So you answered one of my  
8 subsequent questions, so it's fine. My next  
9 question though is when was the last time you  
10 spoke with Ms. Volkel?

11 A. The last time?

12 Q. Yes, sir.

13 A. Would've been that meeting.

14 Q. Okay. And do you know who Naomi  
15 Volkel Pierro is?

16 A. Yes, I do. I know her very, very  
17 well.

18 Q. Okay. And how do you know her?

19 A. She's been part of our church for  
20 many, many years, and we would have these  
21 wonderful big presentations at Christmas and at  
22 Easter, and she has an amazing voice, and she  
23 would be one of our key soloists. She also  
24 ministered in our church choir. And her husband

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1 Tommy -- and I had to do his funeral -- I don't  
2 mean to sound so morbid, all these funerals I  
3 did. I do more than funerals. I do weddings and  
4 everything else -- but he was a good, dear and  
5 precious friend. My heart breaks when I think  
6 about him. Tommy worked closely with Ron, loved  
7 Ron, adored Ron, and then heard from his  
8 sister-in-law about these allegations and was  
9 devastated. I met with Naomi and Tommy about  
10 this and -- yes, to answer your question, I knew  
11 Naomi, I know her, love her, appreciate her, been  
12 part of our church, choir, soloist, and a friend.

13 Q. How many times did you meet with  
14 Naomi and Tommy specifically about Rachel's  
15 allegation?

16 A. One time.

17 Q. And was that the same meeting  
18 where you met with Rachel's family and prayed?

19 A. No. I had met on the -- on the  
20 heels of -- let's see. We had -- oh, yes, when  
21 the missions convention had occurred, Ron came to  
22 me, and that whole thing unfolded. Then, there  
23 was a momentum in the direction of getting an  
24 outside organization. I said I want nothing but

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1 the truth, I want light on this. I am not going  
2 to form a conclusion about Ron or Rachel. We  
3 want an objective group to come in and assess  
4 this intensely. And at that time period is when  
5 I met with Tommy and Naomi.

6 Now, you said in your question  
7 Tommy and Naomi, I only met with them once, but I  
8 met with Tommy after that, because he was a  
9 security guard, and he would secure me on  
10 Sundays, he would be with me, so we would have  
11 conversations, but it was Tommy and Naomi that  
12 had come. And then, I had found out from Rudy,  
13 and from Tommy and Naomi, they would love for us  
14 to connect with Grace, the Grace Organization,  
15 and I said, well, we couldn't be more objective  
16 than to go in the direction of having a group  
17 assess our church that Rudy Migliore, who was  
18 representing Rachel, and Tommy and Naomi, Naomi  
19 the sister, are recommending. I said that's the  
20 group we're going to go with. I want us to be  
21 objective and get the light on this. I mentioned  
22 in my interview that some people were like  
23 uncomfortable, why are you doing this, Pastor,  
24 you know Pastor Ron. I said I know him, I love

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1 him, I did, and -- but nevertheless though, we've  
2 got to investigate.

3 Q. Okay. When was the last time that  
4 you saw Naomi Pierro?

5 A. The very last time recently?

6 Q. Yes, sir, the last time.

7 A. She was scheduled to sing at my  
8 big going away Sunday, but wasn't able to, and so  
9 she wanted to have a meeting with Pastor Derek  
10 Prezzano, my executive pastor, and Pastor Matt,  
11 my music pastor, because she was disturbed at --  
12 Naomi was disturbed at what her sister had to go  
13 through with the deposition, and so she decided  
14 at that point in time to just kind of disconnect  
15 from me, and from the church, because she just  
16 had to work through a lot of stuff with that, so  
17 I haven't seen Naomi for a while.

18 Q. Okay. And do you know if she  
19 attended that meeting that you just described  
20 with your executive pastors?

21 A. Yes. Naomi?

22 Q. Yes.

23 A. I don't know if it was in person  
24 or over the phone, but they definitely met with

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1 her twice.

2 Q. And did you attend that meeting?

3 A. No, I did not.

4 Q. Do you know if anyone else was  
5 present?

6 A. To the best of my knowledge, no,  
7 only Pastor Derek and Pastor Matt and Naomi.

8 Q. Okay. And do you recall the last  
9 time you spoke with Naomi about Ms. Volkel's  
10 allegations?

11 A. That would've been when we  
12 connected on the heels of the Grace  
13 investigation. We hugged, embraced, cried,  
14 spoke, but never anything after that.

15 Q. Thank you. So let's focus a  
16 little bit on Mr. Braaten. When did you first  
17 meet Mr. Braaten?

18 A. When I joined the pastoral staff  
19 in 1991 is when I had the opportunity of meeting  
20 him in person. I had been attending Smithtown  
21 Gospel Tabernacle as a member when I was teaching  
22 at Christ For the Nations, as I mentioned  
23 earlier, and so I saw him from a distance. He  
24 would lead worship sometimes, because Pastor

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1 Forseth would have his team wear a multitude of  
2 different hats, so he would lead worship, he was  
3 over the youth, et cetera. But I actually got to  
4 start working with Ron when I joined the pastoral  
5 staff in 1991.

6 Q. Okay. And do you know if  
7 Mr. Braaten ever gave sermons to the children  
8 that he ministered to?

9 A. He would -- with the youth?

10 Q. Yes, sir.

11 A. Yes, he did, every Wednesday.

12 Q. And do pastors typically  
13 memorialize their sermons?

14 A. Could you define memorialized in  
15 its application here?

16 Q. Do they write their sermons down  
17 at all?

18 A. Some do in an outlining form, some  
19 more, you know, with more copious details. I  
20 don't know how Ron did it. I don't. I know he  
21 was very good at communicating with the youth,  
22 because the youth grew to over 350. It was  
23 booming. The kids loved him. The parents loved  
24 Ron. That's why there was quite an upheaval,

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1 when I decided we would do this major  
2 investigation.

3 Q. If a pastor were to write down  
4 their sermon, would that pastor keep their  
5 sermon?

6 A. Boy, I know a lot of pastors. I  
7 don't know. That's a broad stroke, and I'd make  
8 a generalization here. I'd say most of them keep  
9 files, I did, 31 years of sermons, if you'd like  
10 to read any of them.

11 Q. We can talk off line for that, but  
12 my next question is did SGT require the pastors  
13 to memorialize or write down their sermons in any  
14 way?

15 A. No.

16 Q. And there is no like central file  
17 cabinet of sermons that were given at SGT,  
18 correct?

19 A. No, definitely not.

20 Q. Thank you. What is Ron Braaten's  
21 relationship to Wes Braaten?

22 A. His uncle.

23 MR. LESSER: Clarify who is the  
24 uncle, who is the nephew.

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1 THE WITNESS: Wes Braaten, the  
2 uncle. Ron Braaten, the nephew.

3 BY MS. NAPPI:

4 Q. And was Wes Braaten integral to  
5 the creation of SGT, in your opinion?

6 A. He was part of the beginning of  
7 Smithtown Gospel Tabernacle. The church actually  
8 was called Salem Gospel Tabernacle, and when it  
9 came out here it started as a small group, Bible  
10 study, and the very, very first pastor in, I  
11 believe, 1952 or '53 was Pastor Harry Ring, and  
12 he was kind of a lay pastor, you know, worked his  
13 own job and did that, and that was for about two  
14 or three years. Then, for four years Pastor Wes  
15 Braaten came on, so he was more of a formal  
16 pastor, and he was for four years, and then after  
17 that was Pastor Morris Anderson for approximately  
18 15 years, Pastor Carl Johnson for a year, Pastor  
19 Forseth for 23, and then myself for 22.

20 Q. Thank you. Do you know if Wes  
21 Braaten is still alive?

22 A. Do you know, that's a very good  
23 question. I'm not sure. I think he recently  
24 passed, but I'm having a senior moment here at

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1 64.

2 Q. I don't think that's senior, but I  
3 understand not remembering. Assuming -- strike  
4 that.

5 Do you recall if Mr. Wes Braaten  
6 was still an active member of SGT?

7 A. No, no, he wasn't. Once he left,  
8 he became like an itinerant preacher and was  
9 ministering in the states, I believe up in Canada  
10 and overseas. He didn't stay in the area at all.

11 Q. Thank you. So to your knowledge,  
12 did Ron Braaten possess any qualifications as a  
13 youth pastor that were different from the  
14 qualifications of the youth pastors you've hired?

15 A. In character, in heart, in  
16 passion, in vision, in the basic skill set, no,  
17 I -- the very same.

18 Q. Did he have any educational  
19 qualifications that differed from the youth  
20 pastors you've hired?

21 A. Well, I intensified the value of  
22 having a degree or two in the given field of  
23 ministry, so that would be a point of  
24 distinction.

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1 Q. Was Ron Braaten older than other  
2 youth pastors historically at SGT?

3 A. By only a few years. I'm trying  
4 to remember the ages of Phil Baker that I brought  
5 on, and Kevin Mahaffy, and then Pastor Jeff  
6 Eichenlaub. Ron would be older than most of  
7 them, yes.

8 Q. And are the youth pastors that  
9 you've hired typically married?

10 A. Yes.

11 Q. And do the youth pastors that  
12 you've hired typically have children?

13 A. Yes.

14 Q. And did SGT provide Mr. Braaten  
15 with a place to live, while he was the youth  
16 pastor employed by SGT?

17 A. Yes, they do that for all the  
18 pastors, they provide the parsonage.

19 Q. Okay. And is that a benefit of  
20 employment?

21 A. Yes, it is.

22 Q. And does the youth pastor who  
23 moves into a residence provided by SGT sign a  
24 lease?

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1 A. No.

2 Q. Do they pay rent?

3 A. No.

4 Q. Who's responsible for making  
5 repairs inside a property that a pastor resides  
6 in that SGT provides?

7 A. That would be the sole  
8 responsibility of the trustee board. They're  
9 over the finances in the facility.

10 Q. Understood. Do you know where the  
11 home that Mr. Braaten was provided is located?

12 A. Yes, I do, On Brookside (sp).

13 Q. And was he the only one that was  
14 living inside that home, at the time SGT provided  
15 that home for him?

16 A. His wife and children.

17 Q. Were there any other families  
18 living inside that house?

19 A. He had -- I know he had just  
20 recently adopted his daughter. That would be it.

21 Q. Okay. And can you describe what  
22 that home looked like?

23 A. You mean as far as the emotional  
24 environment, or you mean actually his home?

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1 Q. No, sir. The physical structure  
2 of the home.

3 A. Okay. I'm sorry. You know, as a  
4 minister you think conceptually and abstract  
5 sometimes. Okay. So the physical home itself,  
6 it was well lived in.

7 Q. Was it a one-family home?

8 A. One -- yeah, it was one -- it was  
9 like a ranch, it's a ranch, and, you know, Ron  
10 could build, and so he added on some rooms in the  
11 basement area.

12 Q. Do you know who resided in the  
13 basement area?

14 A. I don't.

15 Q. Do you know what rooms he added to  
16 the basement area?

17 A. I don't. It's been renovated  
18 quite a bit through the years.

19 Q. Was Mr. Braaten allowed to modify  
20 the structure of that home, without permission  
21 from anyone involved at SGT?

22 A. No. It was always contingent on  
23 submitting any changes to the structure of the  
24 home to the trustee board, because the trustee

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1 board would have to either provide the supplies  
2 or the finances to do the renovation.

3 Q. Okay. And so do you know when  
4 Mr. Braaten lived in that home? Approximately,  
5 what year to what year?

6 A. He had actually lived in the condo  
7 number four that my wife and I came into when he  
8 left in 1991, so I would -- I would assume he  
9 started residing in the Brookside home in 1990.

10 Q. Okay. And do you know what year  
11 he left the Brookside home?

12 A. 1996.

13 Q. Okay. Thank you. Are you aware  
14 if Mr. Braaten put any kind of security system in  
15 the home from 1990 to 1996?

16 A. No.

17 Q. And would the addition of a  
18 security system to a property owned by SGT  
19 require, you know, approval by the board that  
20 we've just discussed?

21 A. Yes.

22 Q. And if someone was going to make  
23 an application to the board, to make an  
24 improvement to a piece of property that SGT

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1 owned, is it your understanding that would be  
2 documented in board meeting minutes?

3 A. Yes, absolutely in the trustee  
4 minutes.

5 Q. Thank you. So if you could just,  
6 please, describe how well you knew Ron Braaten,  
7 that would be helpful?

8 A. Yeah. Again, my initial  
9 connection with Ron was just to see him leading  
10 praise and worship when I was a member of SGT.  
11 When I joined the pastoral staff, I had the  
12 opportunity of meeting with him weekly in prayer  
13 meetings and staff meetings. I also had the  
14 opportunity of attending some of the youth  
15 services that he would run.

16 I was always impressed with Ron.  
17 I really was. I felt he had a true, sincere  
18 genuine passion for Christ. He had a deep love  
19 for the young people, and wanted to see them  
20 mature in their relationship with God. He even  
21 came over to our home one day and built a  
22 beautiful little house for my daughter Stephanie,  
23 and I had Stephanie out there just with him and  
24 talking. I felt -- I would never think anything

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1 other than that I was dealing with a good, Godly  
2 man, and that was my interaction with Ron for  
3 many years.

4 When he had the burden to serve on  
5 the mission field, and I was the missions pastor,  
6 I said I want -- let's take him and Linda on,  
7 what do they want to do, and they went to Africa  
8 for two years, and then they based themselves in  
9 Belize, so the first moment of shock for me was  
10 when this accusation came from this missionary in  
11 Belize, when she accused Ron of looking at her  
12 lustfully. It felt like the absolute opposite  
13 antithesis of the individual that knew.

14 Q. Okay. So I want to just break  
15 this up a little bit. Okay? Would you say you  
16 were friends with Ron Braaten?

17 A. Yes.

18 Q. And did you and Diane have dinners  
19 with him and Linda?

20 A. No, we really didn't, but we had a  
21 friendship, and a comradery of heart and spirit  
22 as colleagues in ministry.

23 Q. Other than your comradery and  
24 spirit, did you socialize with Mr. Braaten?

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1           A.       No. Unless it was a church  
2 related event, or a pastoral event where all the  
3 pastors went to gather for pizza with the spouses  
4 at Pastor Forseth's home, something like that.

5           Q.       Okay. Are you aware of anyone  
6 else, other than Rachel Volkel, making  
7 allegations that Ron Braaten sexually assaulted  
8 them?

9           A.       There's -- there's something  
10 that's just recently come up, and I just don't  
11 have any knowledge of it as of yet. The  
12 allegations that are coming up from -- what's her  
13 name -- I'm sorry.

14          Q.       Okay?

15          A.       There's another lawsuit that's  
16 being brought against the church.

17          Q.       Okay. Other than that lawsuit,  
18 are you aware of anyone else --

19          A.       No.

20          Q.       -- making any other allegations?

21          A.       No, absolutely not.

22          Q.       Are you aware of how many youth  
23 ministries Mr. Braaten supervised when he was  
24 employed by the church?

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1           A.       Well, he was over the youth  
2 ministry of the church as the youth pastor, but  
3 within the youth ministry, they would have a  
4 variety of different outreaches that they would  
5 do into the community, or overseas with mission  
6 trips.

7           Q.       Okay. And do you know how many  
8 outreach groups he supervised, while employed by  
9 SGT?

10          A.       Oh, he took many mission trips  
11 with the youth, both local mission trips, and  
12 overseas mission trips. He also would run a  
13 youth camp, a youth retreat, those types of  
14 things working very closely with all the youth  
15 leaders, parents, and then the youth themselves.

16          Q.       And other than Mr. Braaten, did  
17 SGT send any other adults on behalf of SGT to  
18 these events?

19          A.       Well, it was never us to initiate  
20 by any type of imperative. The parents would  
21 decide, hey, can we join you on this mission trip  
22 into Haiti. We want to work with you, Ron, and  
23 the youth. And then, he would have some of his  
24 own youth leaders that said, yeah, we want to go

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1 as well, so nothing was ever commanded or...

2 Q. I understand. And a youth leader,  
3 typically how old would a youth leader be?

4 A. Oh, I would say 18-plus. He would  
5 secure some of the younger, and some of the older  
6 to work with him with the youth. It was  
7 volunteer. I'm not sure exactly how he trained  
8 them, but they had to go through some training  
9 under him to work with the youth, and it was  
10 always, again, under the supervision, and the  
11 close eye of the pastoral staff at large, senior  
12 pastor Pastor Forseth, and the elder board.  
13 Again, because we have a very high standard of  
14 watching and protecting our children and youth.

15 Q. Could you describe the way that  
16 Mr. Braaten was monitored, with respect to the  
17 duties he undertook as a youth pastor?

18 A. I know that he was required, like  
19 myself, to have routine meetings with Pastor  
20 Forseth. There were elders he was accountable to  
21 as well that would, you know, assess and evaluate  
22 his ministry. There was always the avenue by  
23 which parents could communicate any level of  
24 concern, disturbance or desire, anticipation,

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1 expectation of the ministry, and that was always  
2 verbalized and brought before Pastor Forseth or  
3 Pastor Ron or the elders.

4 Q. Okay. And so if there were  
5 written assessments of his ministry, they would  
6 have been documented the way you described  
7 earlier in the board meeting minutes?

8 A. That -- the -- if it got to the  
9 level of getting in the elder board minutes, it  
10 would be if there was something that was of a  
11 concern about his conduct, behavior.

12 Q. Would positive comments about his  
13 behavior have been documented in any way?

14 A. No. No.

15 Q. So what would be the process by  
16 which you would go back and assess a prior  
17 pastor's performance, if there were no documents  
18 to do so?

19 A. In ministry, a lot of that goes on  
20 verbally. When I would hire a new pastor, it  
21 wouldn't be so much the application form that was  
22 filled out, it would be me dialoguing with  
23 pastors that he previously worked with, and they  
24 would never submit to me, you know, written

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1 documents, this is where he was weak or strong,  
2 it was all verbal, this is our assessment.  
3 Pastor Zarlengo, you're going to get a great guy  
4 if you get this guy, this is where he's strong,  
5 it's all verbal. Most of that happens in  
6 ministry among pastors.

7 Q. And what year did Mr. Braaten  
8 decide to leave SGT?

9 A. In 1996.

10 Q. Do you know what the circumstances  
11 of his departure in 1996 were?

12 A. Yes. Both he and Linda felt a  
13 strong call to go full time into missions, and  
14 their first step into that was to -- our  
15 missionary in Africa, Tanzania, Africa, and  
16 that's Nathan Rasmussen -- please, don't ask me  
17 how to spell that, I'm sorry -- Nathan Rasmussen,  
18 and he worked with him for two years, he and  
19 Linda worked with Karen and Nathan for two years  
20 in Africa, and then after that they wanted to  
21 launch their ministry in Belize.

22 Q. And did that require a formal  
23 resignation from SGT?

24 A. I don't know if he just verbally

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1 communicated to Pastor Forseth and said, listen,  
2 I want to go on the mission field. Pastor  
3 Forseth would've applauded that, because he  
4 always had a heart for missions, that's part of  
5 our DNA at SGT, or if he actually turned in a  
6 letter of resignation. Unlikely at that time and  
7 season in our church that he actually turned in a  
8 letter; I think he just verbally communicated,  
9 Pastor Forseth, I want to head to the mission  
10 field.

11 Q. And how do you know that  
12 Mr. Braaten developed this calling to do this  
13 mission work?

14 A. As the missions pastor, we  
15 dialogue with one another, because he indicated  
16 that he was planning on leaving, and was  
17 wondering if we could financially support him in  
18 any way.

19 Q. So he told you that he has this  
20 calling?

21 A. Yes, very much so.

22 Q. Thank you. What is your knowledge  
23 of the underlying incidents that gave rise to  
24 this lawsuit?

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1           A.       My understanding is that after  
2 Rachel had communicated some of this with a  
3 friend, and then to a therapist, and eventually  
4 gave the name to Pastor Linda Lecci, that those  
5 allegations needed to be addressed. At the time,  
6 my hands were tied, no question, Pastor Linda  
7 Lecci will tell you that. She said I need you to  
8 call Ron Braaten and confront him, but I don't  
9 want you to say who it is that contacted you, and  
10 I don't want you to say who it was that you had  
11 abused. I asked her, well, can you tell me the  
12 nature of that abuse, and she said, well, I  
13 really don't want to expound on that. I said  
14 you're putting me in a very precarious position,  
15 but it's serious, and you know how much I respect  
16 you, Pastor Linda, and my heart is broken to  
17 think that this young lady Rachel has walked  
18 through this.

19           Q.       And when did you learn the details  
20 of the assault that Ms. Volkel alleges she  
21 experienced?

22           A.       I'm sorry, could you repeat that?

23           Q.       Sure. When did you learn the  
24 details of the assault that Ms. Volkel alleges

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1 she experienced?

2           A.       That happened in another  
3 conversation with Pastor Linda Lecci. She  
4 expounded a little bit more, because Ron right  
5 out strongly denied it, and I asked Linda to be  
6 on the phone as well. I called them when they  
7 were in Belize. I said, Ron, someone has brought  
8 to my attention an accusation against you. I'm  
9 not going to say who the pastor is, but I respect  
10 this pastor, and I'm not going to say who the  
11 young lady is. So Ron was like befuddled, and he  
12 said you gotta give me more, what are you talking  
13 about, and I said no, you should just be able to  
14 deny it straight out, you know, doesn't matter  
15 what or who, I want to hear from you absolutely  
16 no, and then he said it is, it is, it is, and he  
17 said I'm going to get Linda on, I said  
18 absolutely, I want your wife on here. We want  
19 the truth. I love you and respect you, but if  
20 this accusation is being brought forward, I want  
21 to get this into the light. And so I shared with  
22 him, but I didn't have much detail, so I  
23 contacted Pastor Linda Lecci, and she gave me a  
24 little bit more detail, but do you know it wasn't

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1 until almost a year later that we received a  
2 document from Rachel, about a ten-page document  
3 that broke down all of the abuse that she said  
4 she experienced. It was graphic, it was  
5 detailed, and it was -- it was so disturbing,  
6 disturbing --

7 Q. At that --

8 A. -- and I brought that before my  
9 elder board.

10 Q. Sorry. I didn't mean to cut you  
11 off. Are you done?

12 A. Yes.

13 Q. Okay. I apologize. When you  
14 first called Mr. Braaten with Ms. Lecci on the  
15 line, at that time did you know that the person  
16 was accusing Mr. Braaten of sexually abusing them  
17 when they were a child?

18 A. Linda Lecci was not on the line  
19 with me when I called him. Pastor Linda Lecci  
20 had contacted me, and I said I'm going to  
21 immediately contact Ron Braaten. It was about a  
22 24-hour delay, because in Belize, the time  
23 difference, and he was involved in a lot of  
24 different ministries. So once I got him on the

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1 phone, I did share with him that it was a young  
2 lady, I didn't identify how young, I let it -- I  
3 kept it very nebulous and ambiguous. I felt I  
4 needed to walk very cautiously, because Pastor  
5 Lecci said, please, you've got to approach this  
6 very, very cautiously.

7 Q. Okay. But at the time you called  
8 him, you knew that the allegations were that the  
9 person had been abused when they were a minor,  
10 right?

11 A. Yes.

12 Q. Okay.

13 A. Yeah. Pastor Linda Lecci, she  
14 said I'm counseling someone who was abused when  
15 she was young, like five, six, seven years old.

16 Q. Okay. And at that time when you  
17 contacted Mr. Braaten, and he was in Belize, to  
18 your knowledge was he working with children at  
19 that time?

20 A. I didn't know. I didn't know the  
21 nature of his ministry there. He was pastoring a  
22 church and working, you know, as a missionary in  
23 the area. I knew that both Pastor Braaten and  
24 Linda loved children and youth, and so they had a

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1 lot of orphans that would come into their home,  
2 and they would accommodate and help them. That's  
3 kind of the general understanding that I had.

4 Q. Do you know how much money SGT had  
5 provided to Mr. Braaten for support of his  
6 mission work since 1996?

7 A. We probably initially brought him  
8 on at like \$250.00 a month, and eventually  
9 increased to \$500.00 a month and stayed there.  
10 The moment the allegations were brought to my  
11 attention, and they then were intensified by all  
12 these, you know, other series of events that  
13 happened, you know, about 11 months into it, we  
14 cut off his support, and we told him that that's  
15 going to be cut off until we bring everything  
16 into the light.

17 Q. So was his financial support  
18 stopped prior to the Grace investigation  
19 completion or after?

20 A. It was -- it was actually stopped  
21 even before we initiated the Grace investigation.

22 Q. Okay. Thank you. So you just  
23 testified that Ms. Volkel's account of her abuse  
24 was disturbing, and I guess my question is do you

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1 believe her?

2 A. You know, when I read it, it was  
3 so overwhelming, because I couldn't help but  
4 parallel that in my mind with my own  
5 grandchildren, so, yeah, it was disturbing, very  
6 disturbing -- so what was your question? I'm  
7 sorry.

8 Q. It's okay. Do you need a minute?

9 A. No, I'm good.

10 Q. Okay. I asked if you believe  
11 Ms. Volkel?

12 A. I believe with all my heart she  
13 was abused. I don't know if it was Ron, but I --  
14 I don't question the trauma and the impact on her  
15 life.

16 Q. Were you aware that there were  
17 reports about Mr. Braaten interacting  
18 inappropriately with young girls who were  
19 allegedly dressing inappropriately around him?

20 A. Never. Never was that ever  
21 brought until the Grace investigation began, and  
22 then it was almost like ex post facto, some  
23 people just, you know, started to conjecture and  
24 speculate, and build upon hearsay, you know, oh,

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1 you know, he was angry, I saw him one time angry  
2 on this mission trip. And then, you know, I've  
3 been privy to some of the interviews after the  
4 subpoena, so I read through them, and that was  
5 the first time me hearing that, about the -- some  
6 of the things that had unfolded.

7 Q. Okay. So from the period that you  
8 met Mr. Braaten until 1996, you were unaware of  
9 rumors of him acting inappropriately with young  
10 girls who were allegedly acting and dressing  
11 inappropriately around him?

12 MR. LESSER: Objection.

13 Foundation. I don't think there were any  
14 allegations like that. Objection.

15 MS. NAPPI: I think I used the  
16 word rumors, but --

17 MR. LESSER: Also that.

18 MS. NAPPI: I'll rephrase it.

19 MR. LESSER: So after --

20 BY MS. NAPPI:

21 Q. From the time you met Mr. Braaten,  
22 until 1996, were you aware of any rumors  
23 concerning his behavior and young girls?

24 A. So from when I met him --

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1 Q. 1996?

2 A. In 1991 is when I started, and  
3 that's when I began to work with Ron, and then in  
4 '96 he left, so in that time period nothing,  
5 absolutely nothing. I would have never entrusted  
6 my children to his care, or any of the other  
7 pastors as well. I mean, Pastor Ted Bichsel  
8 worked very closely with Ron Braaten, very  
9 closely with him, and his son Bradley would go to  
10 different things privately with Ron, and if you  
11 know anything about Pastor Ted Bichsel, it was a  
12 shock to him. Tommy Pierro worked closely with  
13 Ron Braaten.

14 Q. Okay. I just was asking you if  
15 you were aware of rumors.

16 A. I'm sorry. I'm expounding.

17 Q. It's okay. I think your answer is  
18 that you were not aware of rumors?

19 A. No, none.

20 Q. At any point, did you become aware  
21 that there were reports of Mr. Braaten riding on  
22 motorcycles with inappropriately clothed minors?

23 A. Only when the Grace investigation  
24 began to bring those things to the surface, after

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1 completely long -- obviously long after his  
2 employment at Smithtown Gospel Tabernacle.

3 Q. Were you aware of any rumors that  
4 Mr. Braaten spent too much time with young girls?

5 A. No.

6 Q. So I'm going to focus a little bit  
7 on the investigation that Grace conducted. So  
8 what led to SGT's hiring of Grace to conduct this  
9 investigation?

10 A. After I was contacted in 2017 by  
11 Pastor Linda Lecci, there was a pretty long  
12 delay. One contingency was, Pastor Linda, please  
13 let me know when she feels she's capable of  
14 informing her parents. As soon as she pulls the  
15 trigger on that conversation, I would like to  
16 step in. Linda said okay, I'll let you know when  
17 she has that conversation with her parents.  
18 Well, she had that conversation with her parents  
19 in December of 2017. Pastor Linda Lecci never  
20 contacted me and never let me know. I want you  
21 to know, because they're friends, I did confront  
22 her on that, and she sincerely apologized. I  
23 mean, that was disturbing to me, because I would  
24 have definitely contacted Rachel and her parents,

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1 but I didn't, and it wasn't until we move now  
2 into 2018 that we get to the missions convention,  
3 and the whole thing that we know unfolded there.

4           Once that happened, I felt now,  
5 you know, it's really elevated, so I -- so we  
6 understood at that point in time that a therapist  
7 had been informed about it, Tommy and Naomi meet  
8 with me, we get Rachel's handwritten ten-page  
9 report, I gave that to the elders, Pastor Linda  
10 Lecci, all of them, and then I hear about the --  
11 so I said, okay, listen, I said to the combined  
12 board -- that's our primary leadership  
13 structure -- I said, listen, we want nothing but  
14 the truth here.

15           Now, at that point, if you read in  
16 my interview, some leaders kind of said why are  
17 we blowing this up, just shut it down, this is  
18 ridiculous, we know Ron, we don't know who she  
19 is. I said absolutely not, absolutely not, we're  
20 going to investigate this, and we need to have an  
21 objective entity do it, because it could sound  
22 like a conflict of interest, or a good boys club,  
23 that we're all trying to hide something, no way.

24           That's when I spoke to Tom and

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1 Naomi, and then my executive pastor, Pastor Derek  
2 Prezzano spoke with Rudy Migliore, and they  
3 recommended Grace, and we said that's the group  
4 we're going to go with. It was about 40 to  
5 \$50,000.00, and I said, Church, we've got to do  
6 it. When the Smithtown News contacted me, they  
7 said we want you to know what you're doing is  
8 absolutely tremendous -- and I'm not patting  
9 myself on the back. I said, no, this is what  
10 we're going to do. They said we can't believe  
11 you're going to do a major investigation, I said  
12 absolutely, and Grace did that for us.

13 Q. Okay. So the decision to hire  
14 Grace was ratified then by the combined board,  
15 correct?

16 A. The decision was made by the  
17 combined board.

18 Q. And was that at a formal meeting?

19 A. Yes.

20 Q. And were there minutes taken of  
21 that meeting?

22 A. Yes.

23 Q. Where are those minutes normally  
24 stored?

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1           A.       We would have them in our computer  
2 here, and the combined board unanimously voted,  
3 all 27, we must hire Grace as an organization to  
4 bring credibility and objectivity to the table,  
5 and to bring everything into the light. That is  
6 our culture here at Smithtown Gospel Tabernacle.

7           Q.       Okay. So who in the leadership  
8 then told you to shut this down, sir?

9           A.       It was -- I was -- you know, I was  
10 reflecting on who specifically had come to me.  
11 It would be primarily some of those who served on  
12 the missions board, the mission leadership,  
13 because they knew Ron, and they were just shocked  
14 that there would have to be any type of  
15 investigation made. He was a missionary that we  
16 loved and supported, and he had served here under  
17 Pastor Forseth for so many years, and so there's  
18 not one in particular. I may have used that in a  
19 broad sense when I said leaders. It was  
20 individuals, families, parents. I received a lot  
21 of emails from his family and other family  
22 members that were disturbed that I was doing this  
23 investigation. It didn't matter to me. I wanted  
24 nothing but the truth, and I say that sincerely.

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1 We want facts and truth and light. That's  
2 consistent with Christ, and that's who we're  
3 following.

4 Q. To your knowledge, what  
5 information did the combined board have at the  
6 time they voted to investigate?

7 A. The information that I supplied  
8 them with, which was my conversation with Pastor  
9 Linda Lecci, the fact that the two or three  
10 detectives had approached Ron, the fact that  
11 there was a therapist that is attesting to the  
12 fact that she was abused, the fact that Tommy and  
13 Naomi Pierro that we all know and love are also  
14 saying that they believe her, and her report, and  
15 with all of that coming together, it kind of  
16 galvanized into a report for me that I presented  
17 to the combined board.

18 Q. Did the combined board receive  
19 Rachel's ten-page statement that you testified  
20 about?

21 A. No, they did not. Only the seven  
22 or eight elders read through it all.

23 Q. Are you aware of how many members  
24 of SGT's various boards communicated with Grace

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1 in their investigation?

2 A. How many members? I do know on my  
3 pastoral staff there was an interview with Pastor  
4 Ted Bichsel, and I believe also Pastor Derek  
5 Prezzano, my own wife Diane and myself. Anyone  
6 else on the pastoral staff, I can't recall. I  
7 don't know of any elder that was interviewed. Of  
8 the deacons, one was Cliff Schrage. Deaconesses,  
9 John Conti's wife, I can't remember her name.  
10 And that's all I recall.

11 Q. And do you know how those  
12 particular members of your congregation were  
13 chosen to be interviewed by Grace?

14 A. I don't know.

15 Q. Okay.

16 A. Grace was -- you know, they --  
17 when they interviewed me, I made a few comments  
18 about my wife, and they said no, no, we're sorry,  
19 we can't tell you how she -- what she presented  
20 in her interview, so they were very, very  
21 cautious with information.

22 Q. And did there come a point time  
23 where Grace released a report or findings to SGT  
24 about the investigation they conducted?

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1           A.       Yes. That came, I believe, in May  
2 of 2018 or '19.

3           Q.       And how did you come to learn of  
4 those findings?

5           A.       Well, they did it in a written  
6 document.

7           Q.       And did you discuss the written  
8 document that Grace provided you with anyone on  
9 the combined board?

10          A.       I discussed it with all the  
11 elders, and then also with the combined board.

12          Q.       And what was the sum and substance  
13 of those discussions?

14          A.       We made the decision to completely  
15 and absolutely disconnect with Ron Braaten. We  
16 made the decision that -- we had already, but, I  
17 mean, we made it official, and we would not  
18 reinstate any support that we had already cut off  
19 a year prior, and that we were going to inform  
20 the congregation that even though the information  
21 is not conclusive on her absolutely, definitely  
22 being abused, or that Ron was the perpetrator in  
23 this, that nevertheless our conclusion is in  
24 harmony with Grace's conclusion that her

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1     allegations were credible, and Ron's, what he  
2     shared in his own defense, was not as credible.

3                     MR. LESSER:   Hillary, whenever we  
4     can take another bathroom break, that  
5     would be appreciated.

6                     MS. NAPPI:   Sure.   Just a few more  
7     questions I want to get through.

8     BY MS. NAPPI:

9                     Q.         Did the combined board and the  
10    elders that you discussed this with vote on this  
11    issue in a formal meeting?

12                    A.         I'm sorry, which issue would that  
13    be?

14                    Q.         The determination of Grace's  
15    findings and how to proceed forward?

16                    A.         Yes.

17                    Q.         And do you know if that was  
18    meeting -- strike that.

19                    Do you know if that meeting was  
20    recorded in minutes?

21                    A.         Yes.

22                    Q.         And do you know if those minutes  
23    were saved in their ordinary course of business?

24                    A.         To the best of my knowledge, yes.

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1 Q. And where would those be located?

2 A. We would have them in our computer  
3 file.

4 Q. Okay. Bear with me a second. Did  
5 there come a point in time when SGT made the  
6 report findings public?

7 A. Everything that Grace had given to  
8 us, it was -- there was something that -- I  
9 forget with Grace what they required of us. They  
10 wanted us to get it first, and then Rachel's  
11 family, and then anyone I think who had done the  
12 interviews, and then if anyone requested, so  
13 that's how we approached it.

14 And then, missionary organizations  
15 started receiving it, churches started receiving  
16 it, but we didn't initiate that. Rachel and her  
17 family decided to get it out there, because then  
18 we started getting contacted by different  
19 churches, saying, wow, you know, we read the  
20 Grace report, and I was like wow I -- I didn't  
21 know -- you know, if they would've asked, we  
22 probably would've given it to them, but we waited  
23 for it to be initiated. But Rachel and her  
24 family decided to get it out there, and I

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1 understand their reasoning was to cut off, you  
2 know, any future outreaches to Belize with Ron  
3 being there, and any financial support.

4 Q. You testified about the police  
5 interviewing Mr. Braaten with respect to  
6 Ms. Volkel's allegations. How did you learn of  
7 that?

8 A. You mean -- I'm sorry, you mean  
9 the night when Ron was approached by these  
10 detectives?

11 Q. Yes, sir, how did you learn of  
12 that?

13 A. Ron came right to me, and to Bob  
14 Zuber (sp) our IT guy, who is a good friend of  
15 Ron, and worked with him in the youth ministry as  
16 well, and Ron just looked white as a ghost, and  
17 came up to me and said I need to talk, I've got  
18 to talk, and this was at the end of our missions  
19 conventions, and then he informed me about the  
20 detectives.

21 Q. Did any members of law enforcement  
22 contact you on behalf of SGT, with respect to the  
23 allegations?

24 A. No. Once Ron communicated to the

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1 detectives that he wanted to have legal counsel  
2 and attain an attorney, they said it's over.

3 Q. And how do you know that, sir?

4 A. It was communicated to us by Ron,  
5 to me by Ron.

6 MS. NAPPI: Okay. We can take a  
7 break here. I don't have much more, so,  
8 I mean, I would like to take a ten-minute  
9 break, this way -- you know, or maybe  
10 five minutes, just so we can --

11 MR. LESSER: Yeah, let's do it  
12 that way. Just a time estimation,  
13 Hillary?

14 MS. NAPPI: For the duration of  
15 it?

16 MR. LESSER: Yeah.

17 MS. NAPPI: Maybe another 20  
18 minutes or so. You know, I'm trying not  
19 to waste all of Pastor Zarlengo's day, so  
20 it's up to you if you want to take a  
21 ten-minute break or five-minute break?

22 MR. LESSER: Do five minutes.

23 THE WITNESS: It's no waste of my  
24 day, absolutely not. I want to bring as

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1 much clarity as I possibly can.

2 MS. NAPPI: Okay. Thank you.

3 MR. LESSER: See you in five.

4 (At this time, a short break was  
5 taken.)

6 BY MS. NAPPI:

7 Q. Do you know if there's anyone  
8 associated with SGT who would have more knowledge  
9 about the allegations levied against Mr. Braaten  
10 than you do?

11 A. I would say definitely not -- I  
12 don't know at all. I think I would be the one  
13 who would have the strongest command of all the  
14 details and facts.

15 MR. LESSER: I'm so sorry,  
16 Hillary. I need two minutes. I just got  
17 a frantic call from my wife. Let me just  
18 deal with this for a second. I'll be  
19 right back.

20 (At this time, a short break was  
21 taken.)

22 BY MS. NAPPI:

23 Q. Pastor Zarlengo, when you received  
24 the Grace investigation report and findings, was

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1    there any parts of that report and finding that  
2    you disagreed with?

3           A.       I had disagreed with -- there was  
4    a little bit of a debate on the advice that I had  
5    received about not contacting the family, and  
6    Bozz (ph) and I disagreed on that one, he felt  
7    like, no, you were at liberty to be in touch with  
8    the family, and I said, no, I would have  
9    absolutely done that, if I hadn't been instructed  
10   by you not to contact them, because it could  
11   compromise the investigation, and he, for  
12   whatever reason, didn't seem to have any recall  
13   on that. When we checked the email  
14   correspondence between us, it looked more  
15   favorable to my conclusion than his, but  
16   nevertheless I didn't feel it needed to be  
17   debated.

18           Q.       Okay. And as you sit here today,  
19   is there anything that you think that SGT could  
20   have done differently to prevent the situation  
21   that brought this lawsuit forward?

22                   MR. LESSER: Objection to form.

23   BY MS. NAPPI:

24           Q.       You can answer the question, sir.

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1 MR. LESSER: Do you understand the  
2 question?

3 THE WITNESS: I'm sorry, Hillary,  
4 could you state --

5 MR. LESSER: I think it's just the  
6 way you phrased it.

7 BY MS. NAPPI:

8 Q. No problem. As you sit here  
9 today, is there anything that you think that SGT  
10 could have done differently to prevent Ms. Volkel  
11 from being sexually assaulted by Mr. Braaten?

12 MR. LESSER: Same objection. You  
13 can answer over objection.

14 THE WITNESS: You know, as I  
15 reflect back, I always want us to  
16 scrutinize and evaluate what we do  
17 better, so I don't think we did anything  
18 perfectly by any means, but I think to  
19 the best of our ability, we accomplished  
20 what we needed to do.

21 BY MS. NAPPI:

22 Q. Okay. Is there anything you  
23 specifically think that SGT could have done  
24 better?

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1           A.       In relationship to the  
2 investigation, or --

3           Q.       The allegations that she made that  
4 she was sexually abused by Ron Braaten?

5           A.       No, I really don't.

6           Q.       Okay. And is there anything that  
7 you think that SGT could have done better with  
8 respect to the investigation of these  
9 allegations?

10          A.       I was just glad that we obtained  
11 an outside objective organization to assist us,  
12 so that we could really maintain credibility and  
13 a good, Godly, truthful conclusion.

14          Q.       Okay. I don't have anything  
15 further. Thank you for your time today.

16          A.       That's it?

17          Q.       I'm not sure if Mr. Argento has  
18 any questions.

19                   MR. ARGENTO: I have a few. Just  
20 give me one moment.

21 BY MR. ARGENTO:

22          Q.       All right. Good afternoon, Pastor  
23 Zarlengo. My name is Patrick Argento from the  
24 law office of Steven F. Goldstein, and I

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1 represent Camp Cherith and Camp Cedarbrook in  
2 this matter, so I only have a few followup  
3 questions for you regarding this matter.

4 Now, you said previously you were  
5 familiar with the names Camp Cherith and Camp  
6 Cedarbrook?

7 A. Yes, vaguely familiar. I never  
8 have gone there and never participated in any  
9 outreaches or ministries or attendance there.

10 Q. Okay. Do you know how frequently  
11 members of the SGT congregation would go to  
12 events or camp at Camp Cedarbrook?

13 A. I don't. I don't know.

14 Q. All right. Are you aware of  
15 anyone from SGT informing Camp Cedarbrook's staff  
16 about Mr. Braaten's -- withdrawn. Let me  
17 rephrase the question.

18 Are you aware of anyone from SGT  
19 ever informing anyone at Camp Cedarbrook about  
20 Mr. Braaten's abuse of Rachel Volkel?

21 A. No.

22 Q. Are you aware of anyone advising  
23 Camp Cedarbrook's staff about Mr. Braaten's abuse  
24 of Rachel Volkel?

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1 A. No, not at all.

2 Q. That's all I have. Thank you.

3 MS. NAPPI: I'm not sure, Len, if  
4 you have any questions?

5 MR. LESSER: You know what, let me  
6 just ask Pastor Zarlengo one question.

7 BY MR. LESSER:

8 Q. I think you testified to it, but I  
9 want to make sure it's clear on the record.

10 Can you describe on the record the  
11 circumstances by which Mr. Braaten was hired as  
12 the youth pastor of SGT?

13 A. When -- I believe it would reflect  
14 Pastor Forseth's style when he hired me, and  
15 hired Pastor Ted Bichsel, and that would be he  
16 would secure a good amount of information by  
17 interfacing with the family, and observing Ron's  
18 participation in the youth ministry, and his  
19 commitment to Christ, his commitment to prayer,  
20 his commitment to being, you know, a good, Godly  
21 minister. All of that would be a huge criteria  
22 assessment evaluation for Pastor Forseth, and  
23 even though there wouldn't be a formal  
24 application, personally it would be far more

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1 intense than that. He would do it on a very  
2 personal, direct level. To bring him onto his  
3 pastoral staff, he would have wanted to have  
4 assessed his ministry that he was already  
5 presently involved in with the youth, and then  
6 how parents felt, you know, he was interfacing  
7 with the youth, and then based on all that  
8 accumulative information, he would have presented  
9 it to the elders and to the combined board to  
10 bring him on.

11 Q. Thank you.

12 MS. NAPPI: I don't have anything  
13 further. I'm not sure, Patrick, if you  
14 do?

15 MR. ARGENTO: Nope. I'm good.

16 MR. LESSER: Thank you very much,  
17 everybody.

18 (Witness was excused.)

19 (Deposition was concluded at 2:15

20 p.m.)  
21  
22  
23  
24

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## 1 INSTRUCTIONS TO WITNESS

2  
3 Please read your deposition over carefully  
4 and make any necessary corrections. You should  
5 state the reason in the appropriate space on the  
6 errata sheet for any corrections that are made.

7 After doing so, please sign the errata  
8 sheet and date it.

9 You are signing same subject to the  
10 changes you have noted on the errata sheet, which  
11 will be attached to your deposition.

12 It is imperative that you return the  
13 original errata sheet to the deposing attorney  
14 within thirty (30) days of receipt of the deposition  
15 transcript by you. If you fail to do so, the  
16 deposition transcript may be deemed to be accurate  
17 and may be used in court.

18  
19  
20  
21  
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23  
24

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- - -  
E R R A T A S H E E T  
- - -

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## 1 ACKNOWLEDGMENT OF DEPONENT

2  
3 I, , do hereby certify  
4 that I have read the foregoing pages and that the  
5 same is a correct transcription of the answers given  
6 by me to the questions therein propounded, except  
7 for the corrections or changes in form or substance,  
8 if any, noted in the attached Errata Sheet.  
9  
10  
11  
12  
13

14 Date \_\_\_\_\_

Signature \_\_\_\_\_

15  
16  
17 Subscribed and sworn to before me this \_\_\_\_\_  
18 day of

19 \_\_\_\_\_, 20\_\_.

20  
21 My commission expires: \_\_\_\_\_  
22

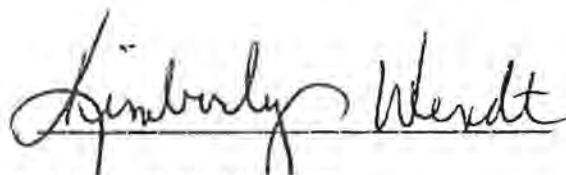
23 \_\_\_\_\_  
24 Notary Public

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## C E R T I F I C A T I O N

I, KIMBERLY WENDT, a Certified Court Reporter and Notary Public for the State of New Jersey, do hereby certify that the foregoing is a true and accurate transcript of the stenographic notes taken by me in the aforementioned matter.



KIMBERLY WENDT  
License No. 30XT00005100  
Notary Public  
My Commission Expires  
On December 6, 2023

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**WORD LIST**

&lt; \$ &gt;

\$250.00 (1)

\$50,000.00 (1)

\$500.00 (1)

&lt; 1 &gt;

1 (1)

10:11 (1)

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10017 (1)

109 (1)

10th (1)

11 (1)

112 (1)

115 (1)

11514 (1)

12 (3)

12:35 (1)

125 (3)

13 (1)

133 (1)

14 (1)

15 (6)

150 (3)

16 (2)

168 (1)

16th (1)

170 (1)

175 (1)

18 (3)

18-plus (1)

19 (1)

1952 (1)

1970s (2)

1976 (1)

1980 (3)

1980s (1)

1982 (5)

1985 (11)

1990 (11)

1991 (18)

1995 (3)

1996 (9)

1998 (1)

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2:15 (1)

20 (6)

200 (1)

2000 (14)

2004 (1)

2005 (12)

2017 (4)

2018 (3)

2019 (3)

2022 (5)

2023 (1)

22 (8)

23 (2)

24/7 (1)

24-hour (1)

25 (4)

250 (1)

27 (3)

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3 (1)

30 (7)

300 (1)

30XT00005100 (2)

30-year (1)

31 (7)

318 (1)

31-year (1)

3200 (1)

3400 (1)

350 (1)

39 (1)

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40 (3)

400 (1)

41 (1)

42 (1)

45 (1)

&lt; 5 &gt;

5 (1)

50 (3)

53 (1)

55 (2)

&lt; 6 &gt;

6 (1)

60 (2)

619658/2019 (1)

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alleges (2)	aside (1)	background (7)	Bozz (1)
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allowed (2)	asking (21)	Baker (2)	Braaten's (5)
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alter (1)	assaulted (3)	based (11)	brain (1)
amazing (1)	assemble (2)	basement (3)	break (17)
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amount (4)	asserted (2)	basically (3)	bridge (1)
amounts (1)	assess (5)	basing (2)	bright (1)
analysis (3)	assessed (1)	basis (3)	bring (21)
Anderson (2)	assessing (1)	bathroom (2)	bringing (1)
anger (1)	assessment (6)	bear (7)	broad (5)
angry (3)	assessments (1)	beautiful (3)	broke (1)
announcement (1)	assist (2)	befuddled (1)	broken (2)
announcements (1)	assistance (1)	began (6)	brokenness (1)
annual (1)	assistant (3)	beginning (1)	Brook (1)
Answer (33)	associate (3)	behalf (3)	Brookside (3)
answered (3)	associated (5)	behave (5)	brother-in-law (1)
answers (2)	associates (1)	behavior (16)	brought (33)
Anthony (1)	assume (5)	behavioral (1)	build (2)
anticipate (2)	assumed (3)	behaviors (1)	building (1)
anticipation (1)	assuming (2)	beliefs (1)	built (1)
antithesis (1)	assumption (1)	believe (26)	burden (2)
anyway (1)	attached (2)	believed (1)	business (1)
apologize (4)	attain (1)	Belize (9)	busy (1)
apologized (4)	attend (2)	Ben (1)	< C >
Apostle (1)	attendance (2)	benefit (2)	cabinet (1)
applauded (2)	attended (7)	best (18)	call (11)
applicable (1)	attending (2)	better (8)	called (15)
application (12)	attends (1)	Bible (14)	calling (3)
applications (1)	attention (12)	Biblical (8)	calls (1)
apply (2)	attesting (1)	Bichsel (12)	CAMP (24)
appreciate (4)	attitude (2)	big (3)	Canada (1)
appreciated (2)	attorney (4)	birth (1)	capable (1)
appreciation (1)	attorneys (3)	birthed (1)	capacity (2)
approach (1)	audible (1)	bit (31)	CAPSS (14)
approached (5)	August (2)	bless (1)	care (3)
approaching (1)	auspices (1)	blowing (1)	career (2)
appropriate (5)	authority (3)	board (94)	carefully (1)
approval (1)	autonomous (1)	boards (7)	Carl (1)
approximately (12)	auxillary (1)	board's (1)	Carle (1)
approximation (2)	available (2)	Bob (1)	carry (1)
area (11)	Avenue (5)	body (2)	case (6)
areas (3)	avenues (1)	booming (1)	Catholic (4)
ARGENTO (10)	average (2)	bored (1)	Catholics (1)
arm (1)	avoid (1)		

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

cautious (3)	classified (1)	conceptual (1)	contractual (1)
cautiously (2)	clear (6)	conceptually (1)	control (3)
CB (1)	clearly (2)	concern (7)	convenience (1)
CEDARBROOK (6)	clergy (4)	concerned (1)	convention (3)
Cedarbrook's (2)	Cliff (4)	concerning (1)	conventions (1)
central (1)	close (2)	conclude (1)	conversation (15)
certain (3)	closely (6)	concluded (3)	conversations (6)
Certified (2)	closure (1)	conclusion (8)	converse (1)
certify (2)	clothed (1)	conclusive (1)	convicted (1)
cetera (2)	club (1)	concurred (1)	conviction (3)
chairman (11)	codify (1)	condo (1)	cool (1)
challenges (1)	cognizant (2)	conduct (8)	copious (2)
change (3)	colleagues (3)	conducted (3)	core (3)
changed (1)	College (2)	conference (1)	Corinthians (1)
changes (5)	colloquially (1)	confident (1)	coronation (2)
chaplain (2)	combined (36)	confidently (1)	correct (38)
chapter (7)	come (20)	conflict (1)	corrections (3)
character (6)	comes (3)	confront (4)	correctly (2)
characterization (1)	comfortable (1)	confronted (1)	correlation (1)
characterizing (2)	coming (5)	confused (3)	correspondence (7)
chastity (1)	command (1)	congenial (1)	could've (1)
check (4)	commanded (1)	congregants (1)	counsel (20)
checked (3)	commenced (1)	congregates (1)	counseled (3)
CHERITH (13)	comment (1)	congregation (14)	counseling (15)
CHEVERIE (2)	comments (2)	conjecture (8)	counselor (1)
Chicago (1)	commission (2)	connect (2)	Country (1)
child (25)	commit (1)	connected (2)	COUNTY (3)
childhood (5)	commitment (7)	connecting (1)	couple (2)
children (48)	committee (1)	connection (5)	course (4)
children's (12)	communicate (4)	connotation (1)	courses (1)
choir (2)	communicated (11)	considered (2)	COURT (14)
chosen (1)	communicating (3)	consistent (1)	covenant (2)
Christ (15)	communication (7)	consistently (1)	covering (1)
Christian (22)	community (3)	constantly (1)	COVID (2)
Christians (1)	companions (1)	constitute (1)	create (3)
Christmas (1)	comparison (1)	constitution (4)	created (7)
church (55)	compensated (1)	constitutional (1)	creation (2)
churches (2)	complain (1)	contact (6)	credibility (3)
church's (1)	complains (1)	contacted (12)	credible (3)
circle (4)	Complaint (18)	contacting (2)	cried (1)
circles (1)	complaints (3)	contain (1)	crime (1)
circumstances (2)	complete (1)	context (5)	criteria (1)
City (1)	completely (3)	Conti (2)	crossclaim (3)
clarification (1)	completing (1)	C-O-N-T-I (1)	cryptic (1)
clarify (2)	completion (1)	contingency (2)	culminated (1)
clarifying (1)	complies (2)	contingent (2)	culture (2)
clarity (2)	compromise (1)	continue (2)	cumbersome (1)
class (6)	computer (7)	continued (2)	current (1)
classes (2)	comradery (2)	Conti's (1)	currently (1)

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Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

curriculum (2)	denomination (4)	directive (1)	effective (1)
cursor (1)	denotation (1)	directly (3)	effort (2)
cut (6)	deny (1)	director (2)	Eichenlaub (1)
< D >	departure (1)	disabilities (1)	eight (3)
d/b/a (2)	DEPONENT (1)	disagreed (3)	either (4)
dad (1)	deposed (1)	disciple (1)	elder (29)
daily (1)	deposing (1)	discipleship (1)	elders (23)
Dallas (2)	deposition (18)	disconnect (2)	elected (1)
damages (2)	depressed (1)	disconnected (1)	elects (1)
date (6)	depth (1)	discuss (4)	elevate (1)
dated (2)	Derek (6)	discussed (6)	elevated (2)
daughter (2)	Derek's (1)	discussing (1)	email (3)
David (3)	describe (9)	discussions (3)	emails (1)
day (6)	described (4)	disposition (3)	embraced (1)
days (1)	DESCRIPTION (14)	distance (1)	emotional (3)
deacon (8)	designed (1)	distinct (1)	emotionally (1)
deaconess (6)	designee (1)	distinction (2)	emphasized (1)
deaconesses (5)	desire (1)	distracting (1)	employed (5)
deacons (19)	detail (4)	disturbance (1)	employee (1)
deal (3)	detailed (2)	disturbed (5)	employees (1)
dealing (5)	details (5)	disturbing (7)	employee's (1)
dealt (1)	detectives (6)	DNA (1)	employment (10)
dean (6)	detector (2)	doctrine (6)	empower (1)
dear (2)	determination (2)	document (27)	empowered (1)
dearest (1)	determine (1)	documentation (1)	encounters (1)
debate (1)	determined (1)	documented (5)	encouraged (1)
debated (1)	devastated (1)	DOCUMENTS (10)	enforcement (1)
Debby (1)	developed (2)	doing (12)	engage (1)
December (2)	development (1)	Dr (5)	entire (4)
decide (2)	device (1)	dressing (2)	entitled (1)
decided (9)	dialogue (7)	Drive (1)	entity (3)
decision (8)	dialogued (1)	driven (1)	entrusted (2)
deemed (1)	dialoguing (1)	dropped (1)	environment (8)
deep (2)	Diane (11)	drugs (1)	Episcopalian (1)
defend (1)	Diane's (1)	duly (1)	epistle (1)
Defendant (3)	Dianne (1)	duration (1)	equivalent (1)
Defendants (2)	didactic (1)	duties (4)	errata (5)
defense (5)	died (1)	< E >	especially (2)
define (6)	differed (1)	ear (1)	ESQUIRE (3)
defined (3)	difference (1)	earlier (8)	establish (1)
definitely (10)	different (12)	early (1)	established (2)
degree (3)	differently (2)	ears (1)	establishing (1)
degrees (1)	difficult (4)	easier (1)	esteem (2)
delay (2)	diminish (2)	Easter (1)	estimation (1)
demand (1)	dinner (1)	ed (1)	et (2)
demeanor (1)	dinners (1)	educated (2)	ethical (3)
demographics (1)	direct (3)	education (15)	ethnical (1)
denied (1)	directing (1)	educational (1)	evaluate (3)
	DIRECTION (4)		evaluation (4)

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

evangelism (3)  
 evening (1)  
 event (3)  
 events (4)  
 eventually (2)  
 everybody (1)  
 evidence (2)  
 evolution (1)  
 ex (1)  
 exact (2)  
 exactly (5)  
 examine (1)  
 examined (1)  
 example (1)  
 exception (1)  
 excused (1)  
 executive (6)  
 exercises (1)  
 Exh-1 (1)  
 Exh-2 (1)  
 Exh-3 (1)  
 exhaustive (1)  
 exhibit (8)  
 EXHIBITS (1)  
 exhortation (1)  
 exhorted (1)  
 exhorts (1)  
 exist (1)  
 existence (1)  
 expanded (1)  
 expectation (1)  
 expectations (3)  
 expected (1)  
 experience (4)  
 experienced (5)  
 expires (2)  
 explain (1)  
 explained (1)  
 explanation (1)  
 explode (1)  
 exposed (1)  
 expound (2)  
 expounded (1)  
 expounding (1)  
 express (2)  
 extend (1)  
 extended (4)  
 extensive (2)  
 extent (3)

extremely (4)  
 eye (2)  
 eyes (5)  
 < F >  
 Facebook (2)  
 facility (1)  
 fact (5)  
 facto (1)  
 facts (2)  
 factual (2)  
 faculty (7)  
 fail (1)  
 failed (2)  
 failures (1)  
 fair (1)  
 faith (1)  
 familiar (3)  
 families (3)  
 family (22)  
 far (11)  
 favorable (1)  
 FCA (6)  
 feel (3)  
 feels (2)  
 fellowship (5)  
 fellowships (1)  
 felt (19)  
 female (1)  
 field (4)  
 fifth (3)  
 fight (1)  
 figure (3)  
 file (13)  
 filed (5)  
 files (6)  
 filing (5)  
 fill (3)  
 filled (2)  
 filter (1)  
 finally (1)  
 finances (4)  
 financial (3)  
 financially (1)  
 find (1)  
 finding (1)  
 findings (5)  
 fine (5)  
 finish (4)

finished (2)  
 firm (1)  
 first (32)  
 five (17)  
 five-minute (3)  
 flesh (1)  
 Floor (2)  
 focus (5)  
 focusing (1)  
 following (2)  
 follows (1)  
 followup (1)  
 foregoing (2)  
 foreign (2)  
 forget (1)  
 forgive (1)  
 form (27)  
 formal (32)  
 formally (1)  
 formed (2)  
 former (1)  
 Forseth (57)  
 Forseth's (3)  
 forthcoming (1)  
 forward (6)  
 found (2)  
 foundation (2)  
 four (5)  
 fragile (1)  
 Franco (1)  
 frantic (1)  
 free (1)  
 frequently (1)  
 friend (5)  
 friends (5)  
 friendship (2)  
 front (1)  
 fruitful (1)  
 full (4)  
 fullness (1)  
 full-time (1)  
 fully (2)  
 function (1)  
 funeral (5)  
 funerals (2)  
 further (3)  
 future (2)

&lt; G &gt;

gained (1)  
 galvanized (1)  
 game (2)  
 GARY (4)  
 gather (1)  
 Gebbia (2)  
 G-E-B-B-I-A (1)  
 general (8)  
 generality (1)  
 generalization (1)  
 generally (4)  
 genuine (1)  
 gestures (1)  
 getting (3)  
 get-togethers (1)  
 ghost (1)  
 gifting (1)  
 gifts (3)  
 girls (4)  
 give (7)  
 given (14)  
 gives (3)  
 glad (1)  
 go (21)  
 God (7)  
 Godly (3)  
 God's (1)  
 goes (4)  
 going (72)  
 GOLDSTEIN (2)  
 Good (23)  
 goodness (2)  
 GOSPEL (14)  
 gotta (1)  
 gotten (1)  
 governance (3)  
 governed (1)  
 Grace (38)  
 Grace's (2)  
 graciously (1)  
 grades (2)  
 gradual (1)  
 Graduate (4)  
 graduated (1)  
 graduation (2)  
 grandchildren (4)  
 grandkids (1)  
 graphic (1)  
 great (3)

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

Greco (5)	helping (1)	implement (1)	intensely (1)
grew (2)	hey (2)	implemented (5)	intensified (2)
grid (1)	Hickey (4)	importance (1)	intensify (1)
group (14)	hide (1)	important (7)	intensity (1)
groups (4)	Higbie (1)	impressed (1)	interacting (1)
grow (2)	high (10)	improvement (1)	interaction (2)
guard (2)	higher (1)	inappropriately (6)	interest (1)
guess (4)	highest (4)	inception (1)	interfacing (2)
guidance (6)	Hilary (1)	incident (1)	international (1)
guide (1)	HILLARY (22)	incidents (1)	internet (1)
guided (1)	hire (3)	including (1)	interpret (2)
guy (3)	hired (22)	incorporates (1)	interpretation (3)
	hiring (5)	increase (1)	interpreted (1)
< H >	historical (1)	increased (2)	inter-relational (1)
HACH (2)	historically (1)	incurred (1)	inter-relationship (1)
Haiti (1)	history (1)	INDEX (3)	interrelationship (1)
half (1)	hit (1)	indicate (1)	interrupt (1)
hand (2)	hnappi@hrsclaw.com	indicated (4)	interrupted (1)
handed (1)	(1)	indicating (2)	interrupting (1)
hands (4)	Hold (2)	indication (1)	interview (14)
handwritten (1)	Holy (8)	individual (7)	interviewed (5)
happen (1)	home (19)	individuals (11)	interviewing (2)
happened (7)	honest (4)	influence (3)	interviews (7)
happening (1)	honor (1)	inform (2)	investigate (5)
happens (2)	horrific (1)	informal (1)	investigation (25)
happy (1)	hour (1)	information (18)	investigatory (1)
hard (3)	house (3)	informed (4)	invite (1)
Harf (4)	housed (1)	informing (3)	invited (1)
harmony (1)	huge (1)	inherited (1)	involved (10)
Harry (1)	hugged (2)	initial (1)	Island (1)
hats (1)	humblly (1)	initially (2)	isolated (1)
head (4)	hundreds (9)	initiate (2)	issue (10)
headed (1)	hungry (1)	initiated (3)	issues (4)
heal (1)	hurting (6)	injuries (2)	Italian (2)
healed (1)	husband (1)	inquire (2)	itinerant (1)
healing (2)	hygiene (1)	inquiring (1)	its (7)
health (4)	hyper (2)	inside (3)	
hear (6)	hypothetical (5)	insight (1)	< J >
heard (3)		Instagram (2)	Jeff (1)
hearing (1)	< I >	instance (1)	Jersey (1)
hearsay (1)	identified (5)	Institute (1)	Jesus (9)
heart (13)	identifies (1)	instituted (1)	Joanne (1)
heartbeat (1)	identify (1)	instruct (1)	job (12)
heartbreak (2)	ill-sensitive (1)	instructed (1)	jobs (2)
hearts (2)	immediate (2)	instructions (2)	Joe (2)
heels (3)	immediately (12)	integral (1)	Joel (1)
Held (1)	impact (2)	integrity (3)	John (1)
help (17)	impactful (1)	intended (1)	Johnson (1)
helpful (4)	imperative (2)	intense (1)	join (2)

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

joined (7)  
Joseph (1)  
judgment (2)  
judgments (1)  
July (1)  
jumping (1)  
June (1)  
jurisdiction (6)

## &lt; K &gt;

Karen (1)  
keep (6)  
keeping (1)  
Ken (2)  
kept (3)  
Kevin (2)  
key (1)  
kidding (1)  
kids (1)  
Kim (3)  
Kimberly (3)  
kind (16)  
kindness (1)  
knew (10)  
know (231)  
knowing (1)  
knowledge (34)  
known (2)

## &lt; L &gt;

labeled (2)  
lady (3)  
laid (1)  
laity (1)  
landscaping (1)  
language (1)  
large (3)  
launch (1)  
launched (1)  
law (4)  
lawsuit (21)  
lawsuits (1)  
lay (4)  
layperson (1)  
lead (2)  
leader (9)  
leaders (13)  
leadership (20)  
leaderships (1)

leading (2)  
learn (11)  
learned (4)  
lease (1)  
leave (1)  
leaving (3)  
Lecci (27)  
led (1)  
left (7)  
legal (8)  
Len (1)  
LEONARD (1)  
lessen (2)  
LESSER (78)  
letter (2)  
level (16)  
levied (1)  
liberty (2)  
License (2)  
lie (2)  
life (5)  
lifted (1)  
light (10)  
limitations (1)  
limited (1)  
Lincoln (1)  
Linda (35)  
Line (17)  
link (1)  
listen (5)  
little (36)  
live (1)  
lived (3)  
living (2)  
Llessar@simonlessar.c  
om (1)  
LLP (2)  
local (3)  
located (4)  
lodged (1)  
logistics (1)  
long (11)  
longer (3)  
longest (1)  
look (12)  
looked (8)  
looking (2)  
looks (1)  
loose (1)

lot (20)  
Lou (1)  
loud (2)  
love (9)  
loved (5)  
lovely (1)  
loves (1)  
low (1)  
lust (3)  
lustful (3)  
lustfully (5)

## &lt; M &gt;

Madison (1)  
Mahaffy (2)  
main (1)  
maintain (5)  
maintained (2)  
major (4)  
makers (3)  
making (9)  
man (5)  
mandated (2)  
Marc (2)  
M-A-R-C (1)  
Marie (1)  
marital (2)  
mark (3)  
MARKED (3)  
marriage (9)  
Marriages (2)  
married (2)  
master's (1)  
material (1)  
materials (1)  
math (3)  
Matt (2)  
matter (9)  
Matthew (6)  
maturation (1)  
mature (1)  
Maus (1)  
M-A-U-S (1)  
mean (23)  
meaning (1)  
means (7)  
meant (1)  
mechanism (3)  
media (3)

meet (8)  
meeting (25)  
meetings (5)  
member (8)  
members (13)  
membership (6)  
memorialize (2)  
memorialized (4)  
memorializing (1)  
memory (1)  
men (3)  
men's (1)  
mention (1)  
mentioned (10)  
mentor (3)  
mentoring (2)  
message (4)  
messaging (3)  
met (22)  
Methodist (1)  
Metzler (2)  
M-E-T-Z-L-E-R (1)  
Migliore (3)  
Mike (4)  
miles (1)  
milieu (1)  
mind (4)  
mindset (1)  
minister (8)  
ministered (4)  
ministering (4)  
ministries (26)  
ministry (57)  
minor (3)  
minors (2)  
minute (2)  
minutes (18)  
mirrored (1)  
mischaracterize (1)  
Mischaracterizes (2)  
mischaracterizing (1)  
misconduct (4)  
mispronounce (1)  
mispronounced (1)  
missed (1)  
missing (1)  
mission (12)  
missionaries (7)  
missionary (10)

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

missions (19)  
 Misstates (1)  
 misstating (1)  
 mistreated (1)  
 mitigate (2)  
 model (1)  
 modify (1)  
 mom (2)  
 moment (7)  
 momentum (1)  
 money (2)  
 monitored (1)  
 Monsignor (1)  
 month (3)  
 months (4)  
 moral (5)  
 morbid (1)  
 morning (2)  
 Morris (2)  
 mother's (1)  
 motorcycles (1)  
 motto (2)  
 mottos (1)  
 move (5)  
 moved (1)  
 moves (1)  
 moving (3)  
 multitude (2)  
 murder (1)  
 mushroom (1)  
 mushroomed (1)  
 music (1)  
 mutually (1)  
 myriad (1)

&lt; N &gt;

name (14)  
 named (1)  
 names (3)  
 Naomi (21)  
 Naomi's (3)  
 NAPPI (101)  
 narrow (2)  
 Nathan (3)  
 Nation (2)  
 Nations (4)  
 Nation's (1)  
 nature (8)  
 nebulous (2)

necessarily (1)  
 necessary (2)  
 need (40)  
 needed (5)  
 needs (6)  
 negligent (1)  
 nephew (2)  
 Never (22)  
 nevertheless (3)  
 NEW (17)  
 News (7)  
 newspaper (1)  
 nickname (1)  
 nicknames (2)  
 night (1)  
 Nine (8)  
 non-CB (1)  
 Nope (1)  
 normally (1)  
 Notary (4)  
 note (2)  
 noted (2)  
 notes (3)  
 noteworthy (1)  
 notice (1)  
 NUMBER (12)  
 numbers (1)  
 NY (3)

&lt; O &gt;

oath (2)  
 obedience (1)  
 Object (5)  
 objected (2)  
 objecting (2)  
 objection (35)  
 objective (5)  
 objectivity (2)  
 observe (3)  
 observed (2)  
 observing (3)  
 obtained (1)  
 obviate (1)  
 obviously (2)  
 occur (2)  
 occurred (4)  
 October (2)  
 offered (2)  
 office (4)

official (4)  
 Oh (13)  
 Okay (218)  
 Old (4)  
 older (3)  
 omniscient (1)  
 once (8)  
 one-family (1)  
 ones (1)  
 one's (4)  
 ongoing (1)  
 open (9)  
 operated (1)  
 operating (2)  
 opine (1)  
 opinion (2)  
 opportunities (1)  
 opportunity (8)  
 opposite (1)  
 oral (3)  
 ordinary (1)  
 organization (8)  
 organizations (1)  
 original (1)  
 orphans (1)  
 outlining (1)  
 outreach (1)  
 outreaches (3)  
 outside (2)  
 overlap (1)  
 overseas (3)  
 overseeing (1)  
 overseer (2)  
 oversight (5)  
 overwhelming (1)  
 owned (3)

&lt; P &gt;

P.C (1)  
 p.m (1)  
 PAGE (16)  
 pages (1)  
 paid (1)  
 pain (3)  
 painted (1)  
 panic (1)  
 paper (1)  
 parallel (1)  
 paranoid (1)

paraphrasing (1)  
 parent (4)  
 parents (17)  
 Pargento@sfgllp.com (1)  
 parishioner (1)  
 Park (1)  
 parsonage (1)  
 part (11)  
 participate (3)  
 participated (4)  
 participation (1)  
 particular (3)  
 parts (1)  
 passage (2)  
 passages (2)  
 passed (2)  
 passion (5)  
 passionately (1)  
 PASTOR (262)  
 pastoral (21)  
 pastoring (5)  
 pastors (46)  
 pastor's (4)  
 path (2)  
 PATRICK (3)  
 patting (1)  
 Paul (1)  
 pay (2)  
 PDF (1)  
 pending (1)  
 penned (1)  
 people (13)  
 percent (3)  
 perfect (2)  
 perfectly (1)  
 performance (3)  
 period (7)  
 permission (1)  
 perpetrator (1)  
 perplexed (1)  
 person (17)  
 personal (6)  
 personality (1)  
 personally (3)  
 personnel (5)  
 person's (1)  
 perspective (1)  
 pertain (1)

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

pertaining (2)  
 ph (1)  
 Phil (2)  
 phone (4)  
 phrase (1)  
 phrased (1)  
 physical (8)  
 physically (3)  
 picture (1)  
 pictures (1)  
 piece (1)  
 pieces (1)  
 Pierro (5)  
 Pierro's (1)  
 pizza (1)  
 Place (9)  
 placed (1)  
 Plaintiff (7)  
 plaintiff's (3)  
 planning (1)  
 play (1)  
 pleading (1)  
 please (24)  
 plethora (1)  
 plummeted (1)  
 point (21)  
 pointed (2)  
 points (1)  
 police (6)  
 policy (3)  
 political (1)  
 polity (3)  
 poor (1)  
 pops (1)  
 posed (1)  
 position (9)  
 positions (2)  
 positive (1)  
 possess (1)  
 possibly (1)  
 post (1)  
 posted (1)  
 potential (1)  
 poverty (1)  
 power (2)  
 practical (1)  
 practice (1)  
 praise (1)  
 pray (6)

prayed (3)  
 prayer (4)  
 prayers (1)  
 preach (1)  
 preached (1)  
 preacher (1)  
 preaches (1)  
 preaching (1)  
 precarious (1)  
 precedent (1)  
 precious (2)  
 prejudice (1)  
 premarital (1)  
 prepare (4)  
 prepared (1)  
 Presbyterian (1)  
 presence (1)  
 present (9)  
 presentations (1)  
 presented (8)  
 presently (2)  
 preserving (1)  
 pretty (5)  
 prevent (2)  
 prevented (1)  
 previously (2)  
 Prezzano (6)  
 pride (1)  
 priest (1)  
 priests (1)  
 primarily (1)  
 primary (2)  
 principle (1)  
 principles (1)  
 prior (30)  
 privately (1)  
 privilege (3)  
 privy (2)  
 probably (17)  
 problem (7)  
 proceed (1)  
 process (11)  
 processing (1)  
 produced (1)  
 PRODUCTION (1)  
 productive (1)  
 productivity (1)  
 proficiency (3)  
 profitable (1)

program (6)  
 programs (2)  
 promise (1)  
 promoted (1)  
 proper (1)  
 property (3)  
 propounded (1)  
 protect (1)  
 protecting (1)  
 protective (2)  
 provide (8)  
 provided (9)  
 provides (1)  
 psychologically (1)  
 Public (6)  
 pull (4)  
 pulls (1)  
 pulsating (1)  
 pure (1)  
 purity (1)  
 purpose (1)  
 pursuant (2)  
 pursue (3)  
 pursuers (1)  
 pursuing (1)  
 pursuit (1)  
 purview (1)  
 put (6)  
 putting (2)

&lt; Q &gt;

qualifications (4)  
 QUESTION (61)  
 questions (12)  
 quiet (3)  
 quite (3)  
 quote/unquote (2)

&lt; R &gt;

RACHEL (31)  
 Rachel's (5)  
 raise (3)  
 ran (1)  
 ranch (2)  
 Rasmussen (2)  
 ratified (1)  
 ratio (1)  
 reach (1)  
 reached (1)

read (40)  
 reader (1)  
 reading (12)  
 reads (1)  
 ready (4)  
 realize (1)  
 realized (1)  
 really (10)  
 reared (2)  
 reason (2)  
 reasoning (1)  
 reassigned (1)  
 recall (11)  
 receipt (1)  
 receive (13)  
 received (13)  
 receiving (5)  
 recognize (7)  
 recognizing (2)  
 recollection (1)  
 recommended (1)  
 recommending (1)  
 record (9)  
 recorded (2)  
 records (1)  
 reduce (2)  
 refer (1)  
 reference (4)  
 referenced (1)  
 references (2)  
 referred (1)  
 referring (3)  
 refine (2)  
 refined (1)  
 reflect (5)  
 reflected (2)  
 reflecting (2)  
 reflection (3)  
 reflective (3)  
 reflects (1)  
 refresh (2)  
 regard (2)  
 regarding (4)  
 regularly (1)  
 reinstate (1)  
 related (4)  
 relation (2)  
 relational (3)  
 relationship (14)

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

relationships (2)	retreat (1)	School (40)	seven (9)
released (1)	return (6)	schools (1)	severity (1)
rely (1)	review (10)	Schrage (2)	sex (10)
remained (2)	reviewed (1)	Schrage's (2)	sexual (24)
remember (9)	reviewing (2)	scope (1)	sexuality (3)
remembering (1)	ridiculous (1)	screen (5)	sexually (8)
remotely (1)	riding (1)	Scripture (12)	SGT (101)
remove (1)	right (28)	scroll (5)	SGT's (4)
removed (1)	rights (1)	scrutinize (1)	shaking (1)
renovated (1)	Ring (1)	season (2)	share (5)
renovation (1)	rise (1)	second (4)	shared (6)
rent (1)	Road (1)	secretary (1)	sharing (1)
repairs (1)	roam (1)	section (2)	sheet (5)
repeat (4)	Robert (1)	secure (3)	shepherd (1)
repeated (1)	Roberts (2)	security (3)	shock (4)
rephrase (10)	role (8)	see (21)	shocked (3)
rephrasing (2)	Roman (2)	seeing (2)	short (5)
replaced (1)	Romans (1)	seen (4)	shot (1)
Report (23)	Ron (86)	Sel (1)	shoulders (1)
reported (5)	Ron's (3)	self-centeredness (1)	show (1)
Reporter (14)	room (2)	seminar (2)	shut (2)
reporters (1)	rooms (2)	Seminars (1)	sign (2)
reporting (4)	ROSE (2)	send (2)	Signature (1)
reports (3)	routine (1)	sending (1)	signed (1)
represent (2)	Rudy (7)	senior (31)	signing (1)
Representing (6)	rules (1)	sense (1)	signs (6)
REQUEST (3)	ruling (1)	sensitive (3)	similar (7)
requested (3)	rumors (6)	sensitivity (1)	similarity (1)
require (4)	run (2)	sent (11)	SIMON (1)
required (7)	running (2)	sentence (2)	simply (1)
requirement (3)	runs (1)	separate (2)	sincere (1)
requirements (3)		separated (1)	sincerely (2)
requires (1)	< S >	separation (1)	sinful (1)
reside (1)	sabbatical (4)	September (1)	sing (1)
resided (1)	sacred (1)	series (1)	sir (38)
residence (1)	safe (4)	serious (5)	sister (3)
resides (1)	Saint (2)	sermon (5)	sister-in-law (1)
residing (1)	saints (1)	sermons (6)	sit (2)
resignation (2)	Sal (2)	serve (5)	site (1)
resigned (1)	Salem (1)	served (2)	sitting (1)
respect (11)	Samaritano (1)	Service (1)	situation (3)
respective (1)	sanctity (1)	services (1)	situations (1)
response (6)	saved (1)	serving (3)	six (9)
responsibilities (5)	saw (3)	session (3)	skill (2)
responsibility (2)	saying (10)	sessions (1)	slapped (1)
responsible (2)	says (3)	set (2)	slash (1)
restate (2)	scheduled (1)	setting (2)	slow (2)
restricted (1)	Schiripa (1)	settled (1)	small (6)
retired (2)	SCHIRIPPA (1)	settling (1)	smaller (1)

Deposition of Pastor Gary Zarlengo

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

**SMITHTOWN (36)**

snap (1)  
 sobered (1)  
 social (1)  
 socialize (1)  
 society (1)  
 sole (1)  
 soloist (1)  
 soloists (1)  
 somebody (2)  
 son (1)  
 soon (1)  
 sophisticated (2)  
 sorry (42)  
 sort (3)  
 soul (1)  
 sound (2)  
 sounds (2)  
 sp (4)  
 space (1)  
 speak (4)  
 speaking (1)  
 specific (10)  
 specifically (14)  
 specify (1)  
 speculate (3)  
 speech (1)  
 speed (1)  
 spell (2)  
 spelled (1)  
 spelling (2)  
 spent (1)  
 sphere (1)  
 spirit (2)  
 spiritual (4)  
 spiritually (1)  
 spoke (8)  
 spoken (1)  
 sports (1)  
 spousal (2)  
 spouses (2)  
 spring (1)  
 stable (1)  
 staff (22)  
 standard (9)  
 standards (3)  
 standpoint (1)  
 start (2)  
 started (10)

starts (1)  
**STATE (8)**  
 statement (3)  
 statements (1)  
 States (4)  
 statistics (2)  
 statute (1)  
 stay (1)  
 stayed (1)  
 stellar (1)  
 stenographic (1)  
 step (6)  
 Stephanie (2)  
 steps (1)  
 STEVEN (2)  
**STIPULATIONS (1)**  
 Stony (1)  
 stopped (2)  
 store (1)  
 stored (1)  
 straight (1)  
 strength (1)  
 strengthened (2)  
 strike (7)  
 stroke (1)  
 strong (9)  
 strongest (1)  
 strongly (2)  
 structure (16)  
 struggling (1)  
 student (5)  
 students (10)  
 studies (5)  
 study (2)  
 stuff (1)  
 style (1)  
 subject (3)  
 submit (1)  
 submitted (2)  
 submitting (1)  
 subpoena (2)  
 Subscribed (1)  
 subsequent (1)  
 substance (3)  
 substantially (1)  
 successes (1)  
 suddenly (1)  
 sue (2)  
 suffered (1)

sufficient (1)  
**SUFFOLK (2)**  
 Suite (1)  
 sum (2)  
 summers (1)  
 Sunday (1)  
 Sundays (1)  
 super (1)  
 superficial (1)  
 superimposing (1)  
 superintendent (5)  
 supervised (4)  
 supervising (1)  
 supervision (6)  
 supplied (1)  
 supplies (1)  
**SUPPORT (7)**  
 supported (8)  
 supposed (1)  
**SUPREME (1)**  
 sure (29)  
 surface (2)  
 surprise (1)  
 surprised (2)  
 survivors (3)  
 Sworn (3)  
 symptoms (1)  
 synthesize (1)  
 system (2)  
 systems (1)

&lt; T &gt;

**TABERNACLE (14)**  
 table (1)  
 take (19)  
 taken (9)  
 talent (1)  
 talents (3)  
 talk (14)  
 talked (2)  
 talking (9)  
 tandem (1)  
 Tanzania (1)  
 targeted (1)  
 taught (8)  
 teach (4)  
 teacher (2)  
 teachers (1)  
 teaching (1)

team (3)  
 tears (1)  
 tech (1)  
 Technician (1)  
 Ted (14)  
 teenagers (2)  
 tell (12)  
 telling (1)  
 ten (5)  
 ten-minute (2)  
 ten-page (3)  
 tenure (1)  
 term (4)  
 terminology (2)  
 terms (1)  
 territory (1)  
 test (2)  
 Testament (1)  
 testified (27)  
 testify (1)  
 testifying (3)  
 testimony (9)  
 Texas (1)  
 Thank (42)  
 theological (5)  
 Theology (3)  
 therapist (6)  
 therapist's (1)  
 Thessalonians (1)  
 thing (7)  
 things (10)  
 think (57)  
 third (1)  
 thirty (1)  
 thorough (2)  
 thoroughly (1)  
 thought (6)  
 thousand (1)  
 three (10)  
 thriving (1)  
 tie (1)  
 tied (2)  
 time (85)  
 timeframe (1)  
 times (3)  
 Timothy (2)  
 title (6)  
 titled (1)  
 today (13)

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today's (6)  
told (8)  
Tom (1)  
Tommy (17)  
tools (1)  
top (1)  
topic (1)  
topics (1)  
total (2)  
touch (3)  
tracking (1)  
trained (5)  
training (13)  
transcript (16)  
transcription (1)  
transcripts (4)  
translate (2)  
transparency (2)  
transparent (1)  
trauma (1)  
tremendous (1)  
trick (1)  
tried (1)  
trigger (2)  
trip (2)  
trips (4)  
true (6)  
truly (1)  
trustee (11)  
trustees (5)  
truth (13)  
truthful (2)  
try (12)  
trying (18)  
turn (2)  
turned (2)  
twice (1)  
Twitter (1)  
two (20)  
type (9)  
types (1)  
typically (4)  
Typo (1)

## &lt; U &gt;

unanimously (1)  
unaware (6)  
uncle (3)  
uncomfortable (2)

undergrad (1)  
underlying (1)  
understand (34)  
understanding (12)  
understands (2)  
Understood (11)  
undertook (1)  
unfair (1)  
unfolded (4)  
unfolding (1)  
United (2)  
University (2)  
unkind (1)  
unresponded (2)  
unstable (2)  
unwilling (1)  
updated (2)  
upfront (1)  
upheaval (1)  
use (9)  
usually (1)

## &lt; V &gt;

vaguely (1)  
value (4)  
variety (2)  
various (2)  
vehicle (1)  
verbal (3)  
verbalized (2)  
verbally (4)  
verbatim (2)  
verse (1)  
versed (1)  
versus (3)  
Victim's (10)  
Video (1)  
viewed (2)  
virgin (1)  
vision (6)  
voice (1)  
VOLKEL (23)  
Volkel's (11)  
volunteer (3)  
vote (2)  
voted (3)  
votes (1)  
vow (2)  
vs (1)

## &lt; W &gt;

waited (1)  
waiving (2)  
Waldon (1)  
walk (4)  
walked (3)  
want (76)  
wanted (17)  
wanting (1)  
warning (1)  
waste (3)  
watch (1)  
watching (1)  
way (28)  
weak (1)  
wealth (2)  
wear (1)  
web (1)  
weddings (1)  
Wednesday (2)  
week (2)  
weekend (1)  
weekly (2)  
weeks (1)  
Well (44)  
Wendt (3)  
went (5)  
We're (28)  
Wes (6)  
We've (6)  
white (1)  
wife (18)  
wife's (2)  
window (3)  
windows (1)  
wish (1)  
withdrawn (1)  
WITNESS (29)  
wives (1)  
woman (5)  
women (1)  
wonderful (1)  
wondering (1)  
word (6)  
words (1)  
work (15)  
workday (1)  
worked (22)

workers (1)  
working (13)  
worship (4)  
would've (17)  
Wow (4)  
write (5)  
written (20)  
wrong (1)

## &lt; Y &gt;

yeah (22)  
year (17)  
years (47)  
Yep (1)  
YORK (12)  
young (13)  
younger (1)  
Youth (68)

## &lt; Z &gt;

Zar (1)  
Z-A-R (1)  
ZARLENGO (18)  
Zarlengo's (1)  
zero (1)  
zeroed (1)  
Zoom (4)  
Zuber (1)